



Alpha Management Limited

Privacy Policy
1st Jan 2019

Alpha Management Limited: Privacy Policy

Updated: 20th February 2019

INTRODUCTION

Alpha Management is committed to protecting your privacy and will only use the information collected in accordance with the applicable data protection and privacy legislation regulations. In this privacy policy we explain how we collect and use your personal information. This applies to all personal information we process when you become our client or use our services, visit our website, or otherwise interact with us. This privacy policy pertains to both Alpha Management Limited (DIFC) and Alpha Management Limited (ADGM).

WHY DATA PROTECTION MATTERS

In an era of increased globalization and rapid advances in technology, information has never been more readily available and transmittable. Businesses and in particular, banking and financial organisations, are increasingly processing and exchanging individual data electronically and across borders.

Personal Data may include any information relating to topics such as an individual's name, age, home address, race, income, health, education, and employment information, and is internationally considered as Sensitive Personal Data. The result of the processing and mishandling (voluntary or involuntary) of personal data can have significant consequences. It is crucial that individuals' right to privacy is protected by establishing effective data protection laws and enforcing legal safeguards to secure and protect personal data and its processing.

WHO WE ARE

Alpha Management Limited was incorporated in Dubai in 2007 at the Dubai International Financial Centre [DIFC] by Shaukat Murad to service the growing regional requirement for tax aware and effective offshore structuring. Alpha Management Limited is regulated by DIFC and DFSA. In 2017, Alpha Management Limited ADGM was created to provide similar activities. This company is regulated by ADGM and FSRA.

COMPANY INFORMATION

DIFC

Name: Alpha Management Limited

Trading Name: Alpha Management Limited

Status of Registration: Active

Type of License: Non Regulated

Registration Number : 0355

Type of Entity: Company Limited by Shares

Date of Incorporation: 19th Mar 2007

Registered office: Unit 2408 South Tower, Level 24, Emirates Financial Towers, PO Box 506556,
Dubai International Financial Centre, Dubai, United Arab Emirates

ADGM

Name: Alpha Management Limited

Status of Registration: Active

Type of License: Non-Financial (Category B)

Registration Number: 000000602

Type of Entity: Company Limited by Shares

Date of Incorporation: 27th April 2017

Registered office: Office 2458, 24, Al Sila Tower, PO Box 5100740, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates

THE TYPE OF DATA WE PROCESS

Any information in our possession that can be used to identify our clients can be defined as "Personal Data". Due to the nature of our business, we obtain Personal Data about different categories of people: our clients, people we deal with on behalf of our clients, people we have relationships with, and other third parties who interact with us. As our business activities are quite varied the types of data we handle can range from names, contact details, copies of passports, bank reference letters, bank statements, professional references, proof of addresses, tenancy contracts, utility bills, title deeds for properties, education certificates, marital relationship status, gender, date of birth, bank account details, source of wealth, source of funds, employment history, résumés, National Insurance Number, Tax Identification Number, Information and documentation relating to your identity, location, family, employment background and financial details. We may obtain such Personal Data from you directly, from our clients, from third parties involved in matters we act on for our clients, and from other third parties (including publicly available information).

HOW WE COLLECT YOUR DATA

Where you are our client, it will be necessary for you to provide us with information directly, and in those cases, it is your responsibility to ensure that all such information is complete in all material respects and not misleading. The accuracy and appropriateness of our advice may be affected as a consequence of your failure to do so. If any information changes, please let us know so that we can keep it updated on our systems.

PURPOSES OF PROCESSING YOUR DATA

We collect and process data on our clients in order to:

- Provide our services to you
- Provide updates on current or future services to you
- For other direct marketing purposes
- Comply with legal obligations and regulations
- For record keeping and to comply with statutory obligations and regulations
- To communicate with you; if this data is not made available to us, we may not be able to continue providing our services to you.

DISCLOSING OR SHARING DATA WITH THRID PARTIES

From time to time, and if you instruct us to do so, we may share your data with:

- Government and Free-zone Authorities
- Intermediary Service Providers who are providing support services to us
- Professional advisors such as lawyers, accountants, financial advisors
- Other financial institutions such as banks, insurance and investment companies
- Tax authorities and regulators for reporting purposes

We may disclose your information in some cases to governmental agencies or entities, regulatory authorities or other persons in line with any applicable law, regulations, court order or official request. For example, your data may be shared with these entities where Alpha Management would be expected to cooperate in the event of a criminal investigation or court order.

SECURITY OF YOUR DATA

Alpha Management will take appropriate technical and organisational measures to protect your personal data against loss or unlawful use. Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

TRANFER OF DATA

The transfer of personal data to countries other than your country of residence or outside this region is often necessary to provide our services to you, for example opening a bank account in another jurisdiction. Alpha Management will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws.

We may also be required to disclose your personal data to foreign public or government authorities. When forming a company and especially applying for visas, your data must be processed by the relevant immigration departments. We may also disclose your personal data to government authorities if applicable law requires disclosure.

YOUR RIGHTS

You may contact Alpha Management to exercise any of the rights you are granted under applicable data protection laws, which includes the following:

- To be informed about how we use your personal data
- To access your data
- To have your data rectified promptly if it is inaccurate or incomplete
- To have your data erased in specific circumstances
- To restrict processing
- To object to processing of your data

Right to access- You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

Right to rectification - You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

Right to erasure- You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the General Data Protection Regulation (GDPR). This includes situations where retention of your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

Right to restriction of processing - You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

Right to data portability- Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.

Right to object- You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.

LEGAL DISCLAIMER

The below refers to both www.alphamanagement.com and www.alphamanagement.ae;

- Whilst every effort has been made to make sure that details contained herein are correct and up-to-date, it does not constitute legal or other professional advice. Alpha Management Limited does not accept any responsibility, legal or otherwise, for any errors or omission in the information provided on our web site.
- Our website is designed to provide general information only. We present the matters only in broad terms on our website, and as regulations and costs can change quickly in this industry, you must not place any reliance upon the information published on this website. Accordingly, we do not accept any liability for any loss or damage suffered when using information on our website.
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- If you choose to access our website from outside the UAE, you do so at your own initiative and you are responsible for compliance with laws in your place of residence or from wherever you are accessing it.
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