



Privacy policy

Introduction

Jadwa Investment is a leading investment management and advisory firm in Saudi Arabia and the wider region. Its clients include government entities, local and international institutional investors, leading family offices, and private wealth investors. Jadwa Investment is licensed by the Capital Market Authority of Saudi Arabia (CMA) as a capital market institution, with registration number 6034-37.

Definitions

- "Jadwa Investment", the "Company" "us", "we", "our" and "The Controller" mean Jadwa Investment Company for the purpose of this notice.
- "The Controller" means any public entity, natural person or private legal person that specifies the purpose and manner of Processing Personal Data, whether the data is processed by that Controller or by the Processor.
- "Data Subject", "Client", "you", "your": means the individual to whom the Personal Data relates to.
- "Personal Data" means any data, regardless of its source or form, that may lead to identifying an individual specifically, or that may directly or indirectly make it possible to identify an individual, including name, personal identification number, addresses, contact numbers, license numbers, records, personal assets, bank and credit card numbers, photos and videos of an individual, and any other data of personal nature.
- "Processing" means any operation carried out on Personal Data by any means, whether manual or automated, including collecting, recording, saving, indexing, organizing, formatting, storing, modifying, updating, consolidating, retrieving, using, disclosing, transmitting, publishing, sharing, linking, blocking, erasing and destroying data.
- "Processor" means any Public Entity, natural person or private legal person that processes Personal Data for the benefit and on behalf of the Controller.
- "Collection" means the collection of Personal Data by The Controller by the provisions of the Law (Personal Data Protection Law), either from the Data Subject directly, a representative of the Data Subject, any legal guardian over the Data Subject, or any other party.
- "Destruction" means any action taken on Personal Data that makes it unreadable and irretrievable, or impossible to identify the related Data Subject.
- "Discloser" means enabling any person - other than the Controller or the Processor, as the case may be - to

access, collect or use Personal Data by any means and for any purpose.

- "Transfer" means the transfers of Personal Data from one place to another for Processing.
- "Financial Data" means any personal statement related to an individual's financial solvency or the source of their funds, including any statement regarding their ability to engage in investments and meet obligations (if any).
- "Explicit Consent" means direct and explicit consent given by the Data Subject in any form that clearly indicates the Data Subject's acceptance of the Processing of their Personal Data in a manner that cannot be interpreted otherwise, and are demonstrable.

Collection and Use of Personal Data

In order to provide investment services, Jadwa Investment collects the following data from Clients, their legal representatives, contracting parties, legal entity representatives, related parties' representatives, or natural person, as follows:

- **Personal Data:** Full name, gender, nationality, national ID/residence permit details and date, passport, mobile number, email address, phone number, age, date of birth, place of birth, marital status and number of dependents, national address, assets, bank account number, investment account balance, investment account data and transactions, education level, disclosure of any relationship with a political figure or a person in a sensitive position and related information, employer.
- **Financial Data:** Approximate personal income, wealth, properties, assets (financial, real state, stocks), tax identification number, bank account number and IBAN, and any other data related to the income of the data subject.
- **Biometric Data:** Signature and handwriting data, fingerprints, voice, and facial recognition data.
- **Health Data:** In some cases, we may collect medical reports, health status, whether physical, mental, or psychological.
- **Other Data:** Personal Data for compliance with laws, regulations, and regulatory requirements, or for providing online services, troubleshooting issues occurring during the use of Jadwa Investment's digital channels, and analyzing customer behavior to improve user experience, such as location (including geolocation and IP address) and communication logs (including video or audio recordings, such as phone calls). Personal Data collected during investigations, such as data collected



during customer due diligence or anti-money laundering and counter-terrorism financing checks.

Certain Personal Data is collected obligatorily, as it is necessary to provide the requested services and products. Additional data is collected optionally to improve the quality of services. Personal Data will not be processed in a manner inconsistent with its Collection purpose or the extent permitted by law.

Legal Basis for Collecting Personal Data

Personal Data is collected and used based on the following:

1. **Explicit Consent**, which can be withdrawn at any time, provided that it does not affect Processing based on another legal basis.
2. **Regulatory compliance**, to meet the requirements of authorities such as, but not limited to, the Capital Market Authority, Ministry of Commerce and the Zakat, Tax and Customs Authority.
3. **Contractual obligation**, by entering into a contractual relationship with Jadwa Investment to provide investment services.
4. **Legitimate interest**, to enable continuous improvement of the services provided to Clients and to achieve the objectives related to Client investments.

If the Company is unable to collect Personal Data, it will not be able to fully provide services and products to the Client. As a result, the Client may not receive the desired service, and the contractual relationship between the Company and the Client may be affected.

Methods of Collecting Personal Data

Personal Data is collected through the following methods:

- When you provide us with your Personal Data directly.
- When we collect and verify your Personal Data from other sources (such as regulatory bodies, public authorities, financial and regulatory agencies, and service providers).
- When we collect certain Personal Data based on your Explicit Consent, ensuring that we use your data only in ways you have agreed to that may not have been specified during or before the contractual relationship.

Purpose of Collecting, Processing, and Using Personal Data

1. **Client onboarding and KYC procedures:** We process Personal and Financial Data to onboard you as a new Client of the Company, create a Client account, and register you on the Company's platforms. This process is essential to comply with relevant laws and regulations. We also process Personal and Financial Data to meet regulatory requirements, including verifying the Client's

identity for any transaction related to their account with Jadwa Investment and sharing this information with regulatory and government authorities.

2. **Client Relations:** We process Personal Data to maintain contact with Clients and ensure they receive the best possible service. The Client will also be contacted regarding his inquiries, requests and provide regular updates to the Client.
3. **Account Management:** We process Personal Data for account management purposes, including opening, closing, and updating Client account.
4. **Account Transaction Management:** We use Personal and Financial Data to process financial transaction such as deposit, withdrawals, transfer, subscription, redemptions, Collections, and payments, in addition to accounting and auditing purposes.
5. **Regulatory Reporting:** We use Personal Data to comply with regulatory requirements, which include periodic reporting.
6. **Business and Data Analysis:** We may use Client data for statistical and market analysis purposes.
7. **Marketing and Communication:** We may use your Personal Data for marketing purposes, such as offering new products or promotional offers that align with the financial needs and preferences of Clients.
8. **Compliance and Security:** We may retain Personal Data to comply with various legal and regulatory requirements, including anti-money laundering regulations and Know Your Customer (KYC) obligations.
9. **Awareness:** We promote awareness about various security measures, precautions, and best practices to protect Client accounts and Personal Data. This may include messages on avoiding phishing attempts, protecting passwords or verification codes, and providing guidelines on safe investment practices.
10. **Third-Party Services:** We process and share Client Data with our partners to ensure your requests for investment in products offered by the Company, whether within Saudi Arabia or abroad, are met.

Sharing of Personal Data

Personal Data may be shared with:

1. Jadwa Investment's affiliated companies.
2. Regulatory and supervisory authorities and other government entities, whether for verification purposes or for legal compliance.
3. Third parties that assist in providing services to Jadwa Investment.



4. In cases where there is a legitimate, public, necessary interest, or legal requirement.

Personal Data Storage and Retention

Personal Data will be securely stored using advanced security measures such as encryption, encoding, and access control management, in accordance with regulatory requirements for retaining Personal Data or related information, without conflicting with applicable laws and regulations.

Jadwa retains personal data only for as long as necessary to fulfill the purposes for which it was collected, to comply with applicable legal, regulatory, and contractual obligations, and to establish, exercise, or defend legal claims. Upon expiry of the applicable retention period, Personal Data will be securely destroyed, anonymized, or archived in accordance with applicable laws and internal policies.

Personal Data Breach Management

Jadwa maintains procedures for identifying, assessing, managing, and reporting personal data breaches. In the event of a personal data breach that may result in harm to data subjects or otherwise requires notification under applicable laws and regulations, Jadwa will take the necessary actions and notifications in accordance with the requirements of the Personal Data Protection Law and related regulations.

Rights of the Data Subject

- **Right to be informed:** You have the right to be informed of the legal basis for collecting Personal Data and the purpose of its Collection.
- **Right to Access Personal Data:** You have the right to access their Personal Data held by the Company to the extent allowed by law.
- **Right to Request Personal Data:** You have the right to obtain a copy of their Personal Data in a structured, commonly used, and readable format, either electronically or in print, to the extent permitted by law within 30 days. The Company may extend this period for up to an additional 30 days, with you being informed of the extension and the reasons for it.
- **Right to Request Data Correction:** You have the right to request the correction, completion, or update of their Personal Data held by the Company if they believe any Personal Data is incorrect or incomplete.
- **Right to Destruction:** You have the right to request the destruction of Personal Data held by the Company, provided there is no legal obligation for the Company to retain the Personal or Financial Data.
- **Right to Withdraw Consent:** You have the right to withdraw their consent to the Processing of their Personal Data at any time, within the limits permitted by

law, and must inform the Company through the contact methods provided in this privacy notice.

Cookies

Cookies are small files stored on your device that track your interactions with a website or app. We may use cookies to improve your experience, protect you from fraud and unauthorized activity, or for internal analytics and reporting.

Amendments

The Company may update this notice from time to time to comply with laws and regulations and their amendments. The latest version of this notice was updated in 2026. Please review this Policy periodically to stay informed of any changes or updates.

Contact

For any inquiries or to exercise any of the rights mentioned above, please email our Data Protection Officer at DPO@jadwa.com.

Complaints and Escalation

If you believe that your Personal Data has been processed in violation of applicable data protection requirements, you may submit a complaint through the contact channels provided in this Privacy Policy. If you are not satisfied with our response to your request or complaint, or if no response is provided within thirty (30) days from the date of submission, you may escalate your complaint to the Saudi Data and Artificial Intelligence Authority (SDAIA) through the channels designated by the competent authority.