

MENA Growth Partners
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Mena Growth Partners Ltd

Privacy Policy

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Privacy Policy for MENA Growth Partners Limited (MGP)

This Privacy Policy explains how MENA Growth Partners Limited ("MGP," "we," "us," or "our"), a Category 4 firm licensed by the Financial Services Regulatory Authority (FSRA) of the Abu Dhabi Global Market (ADGM), collects, uses, discloses, and protects your personal data. This policy is also intended to be compliant with the privacy regulations of the US Securities and Exchange Commission (SEC).

As a firm specializing in advisory and deal-arranging services, we are committed to protecting the privacy and security of the personal data we handle in accordance with the ADGM Data Protection Regulations 2021 (the "ADGM Regulations"), SEC Regulation S-P, and other applicable laws.

1. Information We Collect

We may collect and process personal data that you provide directly to us, or that we receive from third parties or publicly available sources. The types of personal data we may collect include, but are not limited to:

- **Identity Data:** Full name, date of birth, nationality, passport details, and other forms of identification.
- **Contact Data:** Postal address, email address, telephone numbers.
- **Financial Data:** Bank account details, source of wealth, and financial statements.
- **Professional Data:** Job title, company name, and employment history.
- **Transaction Data:** Details of services you have received from us and payments made.
- **Technical Data:** IP address, browser type, and other information collected via our website or digital platforms.

This includes what is known as Non-Public Personal Information (NPI), which refers to any personally identifiable financial information collected by us, including information provided by you or resulting from our advisory services.

2. How We Collect Your Information

We collect personal data from various sources and through various means, including:

- **Direct Interaction:** When you engage with us for advisory services, respond to our communications, or meet with our team members.
- **Third-Party Services:** In the course of our business operations, we use several third-party software providers that may process your data. This includes, but is not limited to:
 - **Google Workspace:** For email, documents, and other collaborative tools.
 - **Zoom:** For video conferencing and virtual meetings.
 - **Monday.com:** For project management and client relationship tracking.
 - **Docusign:** For secure electronic document signing.
 - **Adobe Acrobat:** For document management.
 - **GoDaddy:** For our website hosting and domain services.
- **Public Sources:** We may collect publicly available information from corporate registers, professional networks, and other public databases.
- **Office Network:** Our office Wi-Fi is provided by Etisalat (E&). Please note that your device's technical data may be collected as part of standard network operations.

3. Purpose of Processing Your Personal Data

We use your personal data for the following purposes:

- To provide our advisory and deal-arranging services to you.
- To comply with our legal and regulatory obligations as a firm licensed by the ADGM/FSRA and subject to SEC regulations, including for anti-money laundering (AML) and know-your-client (KYC) checks.
- To manage our business operations, including billing, record-keeping, and internal administration.
- To communicate with you about our services or business updates.
- To maintain and improve the security of our services and IT infrastructure.

4. Disclosure of Your Personal Data

We may disclose your personal data to the following categories of recipients:

- **Regulatory and Government Authorities:** As required by law or regulation, we may share your data with the ADGM/FSRA, the SEC, and other government bodies.
- **Third-Party Service Providers:** We use trusted third-party service providers to support our business operations, as detailed in Section 2. We have agreements in place to ensure these providers handle your data securely and in line with our instructions and all applicable regulations.
- **Professional Advisers:** Your data may be shared with our auditors, lawyers, or other professional advisers for the purpose of obtaining professional advice.
- **Counterparties:** In a deal-arranging context, we may share relevant personal data with other parties involved in the transaction.

We do not share your Non-Public Personal Information with non-affiliated third parties for marketing purposes.

5. Data Security

We have implemented reasonable technical and organisational measures to protect your personal data, including your NPI, from unauthorised access, use, alteration, and disclosure. These measures include secure access controls, encryption, and staff training on data protection best practices.

6. International Data Transfers

Given the global nature of financial advisory services, your personal data may be transferred to and stored in a location outside of the ADGM or the United States. We will only transfer your data to jurisdictions that provide an adequate level of data protection, or where we have put in place appropriate safeguards as required by the ADGM Regulations and SEC rules.

7. Your Rights

Under the ADGM Regulations and US laws, you have the following rights concerning your personal data:

- **Right to Access:** To request a copy of the personal data we hold about you.
- **Right to Rectification:** To request the correction of inaccurate or incomplete personal data.

- **Right to Erasure ("Right to be Forgotten"):** To request the deletion of your personal data under certain circumstances.
- **Right to Restriction of Processing:** To ask us to suspend the processing of your personal data.
- **Right to Data Portability:** To receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** To object to our processing of your personal data.
- **Right to Opt-Out:** In accordance with SEC regulations, you have the right to instruct us not to share your Non-Public Personal Information with non-affiliated third parties, except as permitted by law. As stated in Section 4, we do not currently share NPI for marketing purposes, so no action is required on your part to opt-out.

To exercise any of these rights, please contact us using the details provided below.

8. Data Retention

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

9. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website and will be effective from the date of publication.

10. Contact Us

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact us at:

Mena Growth Partners Limited contact@mgp.capital, +971 054 744 5470