

SAHEM TRADING AND INVESTMENTS COMPANY PRIVACY POLICY

1. INTRODUCTION

This privacy policy (**Policy**) sets out Company's ("SAHEM") commitment to and our policy in relation to your privacy. The provisions of this Policy will apply to users (Whether existing client's or not) of SAHEM Services through our branches or, Platform ("Site") or the telephone (including Interactive Voice Response system, and mobile phones) unless we state otherwise.

This Policy is issued pursuant to the applicable laws of Palestine and is to be read in conjunction with general terms of business. SAHEM reserves the right to amend this Policy at any time without notice. You are advised to and agree to revisit this page regularly and your continued access to or use of the Site will mean that you agree to any changes to this Policy.

To receive the best from our services, please keep your personal data (including your email address) accurate and up to date. You can do this by logging into our secure website. Please take the time to read this Policy carefully. In opening an account with us you consent to our use of your personal data in accordance with SAHEM general terms of business and the Privacy Policy. We hope that by implementing and operating this Policy, we will make your Online experience more secure and enjoyable.

In this Policy:

"**Access code**" has the meaning given to that term in paragraph 8.1.

"**Personal information**" has the meaning given to that term in paragraph 2.1.

references to: "**you**", "**your**" or "**yours**" means our former, existing, or prospective clients and/or the person(s) accessing the Site; and references to: "**we**", "**us**" or "**our**" mean SAHEM Company (**SAHEM**).

2. PERSONAL INFORMATION

2.1 The nature of personal information

Personal information is information or an opinion (whether true or not and whether recorded in a material form or not) relating to an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

The nature of the personal information we collect may include the following:

- (a) your name, address, date of birth, gender, marital status, certain other personal and contact details, occupation/employment details and work history, assets and income and other financial details.
- (b) information about your transactions with us, our affiliates or third parties, account balances, payment history and website and account activity.
- (c) your opinion in respect of products, services and/or staff; and
- (d) a few personal details unlikely to be known to other people to help us identify you over the telephone.

2.2 How we collect personal information

Where practical, we collect personal information directly from you. For example: (a) on applications or other forms that you complete for us; (b) when you deal with us over the telephone; (c) when you write to us; or (d) visit our Site or other websites.

When you communicate with us on the telephone, we may monitor and record the call between you and our representative to ensure accuracy, security, service quality and for training and regulatory purposes.

There may also be occasions where we are required to source personal information about you from a third party (without your direct involvement). For example, we may collect personal information from a credit reporting agency, publicly available sources of information, your representatives, our related or affiliated companies, business alliance partners, third party brokers, custodians, administrators, and service providers and from government agencies.

So that we can better tailor our information and products to your needs, we also use technology known as “cookies” to collect statistical information on website activity, such as the number of people using our website and how they navigate through it. You can configure your browser to accept or reject cookies or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our Site.

A cookie is a file containing small amounts of information that is sent to the browser on your computer, mobile or tablet when you visit a website. Cookies do a number of different jobs, such as remembering your preferences, and generally improving your online experience.

Our website creates a session cookie, which only lasts for the duration of your visit and is deleted when you close your browser. Session cookies enable a website to remember your movement from page to page so you are not repeatedly asked for the same information on every page that you've already given to the site.

If you wish, you can usually adjust your browser settings so that your computer does not accept cookies by default. However, our site may not behave as intended if cookies are disabled. Alternatively, you can adjust it to alert you when a website tries to put a cookie on your computer. Please refer to your browser instructions or help screens to learn more about these functions. Please remember, cookies do not contain any confidential information, unless you knowingly provide such information.

Your browser generates other information, including your language, your Internet Protocol address ("I.P. Address"). An I.P. address is a set of numbers which is assigned to your computer during a browsing session when you log on to the Internet via your internet service provider or a network. Your IP address is automatically logged by our servers.

Our purpose in collecting personal information

2.3

We collect personal information about you that is necessary or connected to the performance of our services and activities. Certain applicable laws may also require us to collect personal information (for example, for anti-money laundering and counter-terrorism financing compliance purposes). If you do not provide this personal information, SAHEM may not be able to deal with you, or provide you with a product or service.

For example, we may collect your personal information to:

- (a) process an application.
- (b) understand your needs or check your eligibility for a product or service.
- (c) respond to your requests or inquiries or manage the provision of a product or service to you.
- (d) perform other administrative and operational tasks (including risk management, compliance, systems development, record keeping, staff training, undertake market or customer satisfaction research).

- (e) provide information to you about a product or service that may be of interest to you.
- (f) evaluate credit worthiness.
- (g) prevent or investigate any fraud or offence (or suspected fraud or offence).
- (h) meet our legal and regulatory requirements; and
- (i) producing data, reports and statistics which have been anonymized or aggregated to ensure that they do not identify you as an individual.

3. THE STORAGE AND PROTECTION OF PERSONAL INFORMATION

3.1 Storage and access

We will handle, store, and protect your personal information by maintaining physical, electronic, and procedural safeguards in accordance with applicable law in Palestine.

Your personal information may be stored in hardcopy documents or electronically. Your personal information can only be accessed by authorized persons & processes. We train our staff how to properly handle personal information.

3.2 Protection

Our goal is to protect any personal information that we hold about you from intentional & unintentional misuse, loss, and unauthorized disclosure. We maintain physical security, such as locks and security systems, to watch over our paper and electronic data records and our premises.

We also maintain computer and network security: for example, we use firewalls, intrusion prevention software and other security measures such as identification codes and passwords to control access to computer systems. You also can help us to protect your privacy by:

- (a) restricting access of your personal information to any persons who are not authorized to deal with us on your behalf.
- (b) contacting us immediately when you change contact details, such as your address and telephone number; and
- (c) understanding the risks associated with using the internet and computers (see further paragraph 7).

3.3 Retention

We have legal and regulatory obligations to keep customer records. Accordingly, we may have to keep your personal information even after our relationship with you has ended. We will ensure your information is protected as described above.

4. DISCLOSURE OF PERSONAL INFORMATION

4.1 Disclosure to parties in the SAHEM Group

We may share and you consent to the sharing of your personal information with other entities in the SAHEM Co.

4.2 Disclosure to third parties

We may disclose relevant personal information to third parties that help us provide services or otherwise facilitate our business (and this may include overseas organizations). These organizations are bound by confidentiality arrangements & non-disclosure agreements, and we prohibit such parties from using your personal information except for the purpose for which we supplied it to them.

Subject to any general duties of confidentiality towards our clients and subject to applicable law from time to time, SAHEM may need to disclose, and you consent to the disclosure of your personal information to:

- (a) brokers or agents who refer your business to us.
- (b) security settlement and payment verification.
- (c) an organization that is in an arrangement or alliance with us for the purpose of promoting each of our respective products and services.
- (d) any service provider that we engage to carry out our functions and activities or otherwise assists us in conducting our business.
- (e) regulatory bodies, government agencies, law enforcement bodies and courts; (f) other parties we are authorized or required by law to disclose information to.
- (g) our accountants, auditors, lawyers, and other professional advisors.
- (h) credit reporting or debt collecting agencies.
- (i) other financial institutions (such as banks).
- (j) any person acting on your behalf, including those who have been identified as your financial advisors, attorney, lawyer, or representatives.
- (k) protect SAHEM from legal or administrative actions and liabilities arising on account of inaccurate or false information provided by you or provided to SAHEM on your behalf.
- (l) other parties in respect of whom you have given us your consent (express or implied); and
- (m) otherwise, where reasonably necessary to perform a particular service to you.

5. CLIENT ACCESS TO PERSONAL INFORMATION

5.1 Client requests for access

Subject to certain exceptions, you are entitled to access the personal information SAHEM holds about you. You can also ask for corrections or updates to your personal information to be made. We will need to verify your identity to ensure that we do not provide your information to someone who is not authorized to access it. We would ask that you make requests to access personal information to us in writing using the following contact details:

Fax: +972 (970) 2296 5713

E-mail: sahem@sahem-inv.com

Write to: sahem-inv.com

6. EXCEPTIONS TO CLIENT ACCESS

In certain limited circumstances, we may not be able to tell you what personal information is held about you including where:

- (a) we are prevented from making disclosure by applicable law or by a regulatory or governmental authority.
- (b) the information relates to actual or anticipated legal proceedings.
- (c) the privacy of other individuals may be compromised or threatened.
- (d) the dissemination of such information may have anti-competitive effects; or
- (e) the information would reveal commercially sensitive business information or decision-making processes.

7. UPDATING PERSONAL INFORMATION

If we have accurate information about you, it enables us to provide you with the best possible service. Our goal is to ensure that the personal information we hold is accurate, complete, and up to date. Please contact us if any personal information that you provided us has changed or if you otherwise learn that current personal information, we hold about you is inaccurate, incomplete, or out-of-date.

8. RISKS IN USING THE INTERNET AND COMPUTERS

8.1 Client awareness of risks and security requirements

There are significant risks associated with using the internet for conducting transactions including banking and securities trading transactions.

You acknowledge that anyone who has your personal identification number (PINs), passwords or access code (as applicable and hereafter collectively referred to as “**access code**”) can make transactions on your account(s), so it is critical that you take special care to protect them.

You acknowledge that as the accountholder, you may be responsible for transactions and operations on your account if the correct access code for that account has been used. Accordingly, you should not disclose your access code to any third-party including family, friends, SAHEM's internal employees & customer services.

You should not use public computers or a computer that contains software, such as “spyware”, that can compromise access codes and/or personal information and we will not be liable for any losses that you may suffer as a result.

Please observe our terms and conditions and security requirements for use of our Services to protect against unauthorized access including, but not limited to:

- (a) Ensuring access codes given to you and your authorized users are secure.
- (b) Destroying any documentation, we issue containing your access codes.
- (c) Trying to memories your access codes and not telling anyone of your access codes.
- (d) Immediately notifying us if you suspect the security of your access code(s) have been breached or that your personal or financial information has been compromised or used in a fraudulent manner.
- (e) Clearing of browser caches after undertaking any transaction involving dissemination of personal information.
- (f) Ensuring that the computer(s) or document(s) containing personal information are not left unattended and that you log off each time you access your personal information.
- (g) Do not access suspicious websites and regularly update anti-virus, system and application patches, and security software on your system.

8.2 Other websites

Our Site may contain links to other websites provided for your convenience. You should take care to understand and evaluate their privacy standards and personal information handling procedures as they may or may not be consistent with ours.

9. COMPLAINTS PROCEDURE

You are entitled to complain if you believe that your privacy has been compromised. We will respond to a complaint as soon as possible and try to resolve the complaint within 3 business days. When this is not possible, we will contact you within that time to let you know how long it will take to resolve the complaint.

Alternatively, you can send a complaint by to the following email:

sahem@sahem-inv.com

10. FURTHER INFORMATION

If you need more information or have a query relating to our Privacy Policy, contact the person, department, or branch that you normally deal with, or send an email to: Sahem@sahem-inv.com.