



Executive Summary:

1. Introduction & Context

Multi Met Trading LLC (MMT) is committed to the highest standards of data protection, managing all personal and sensitive information with integrity, transparency, and care. This policy outlines MMT's approach to safeguarding the privacy rights of its customers, employees, contractors, partners, and other stakeholders. It applies to all data processing activities across MMT's operations, covering employee, customer, vendor/partner, operational, and digital data.

The primary goal is to ensure compliance with UAE Federal Decree Law No. 45 of 2021 on the Protection of Personal Data (PDPL), align with international best practices, foster trust, and mitigate data-related risks. The policy is grounded in the core principles of Confidentiality, Integrity, and Availability.

This summary highlights the critical action points derived from the policy.

2. Governance, Oversight & Responsibility

- The Board of Directors and Senior Management must actively endorse the data protection strategy, ensure sufficient resources are allocated, and monitor overall compliance and performance.
- Formally establish and maintain a cross-functional Data Protection Committee (DPC) (with representatives from IT, compliance, HR, operations) to oversee data protection performance, risks, and improvements.
- Appoint and empower a dedicated Data Protection Officer (DPO) responsible for overseeing compliance, acting as the primary contact, advising on strategy, conducting audits/risk assessments, and managing breach responses.
- Ensure Department Heads are accountable for implementing data protection practices within their teams and escalating risks to the DPO/DPC.
- Clearly define and communicate data protection responsibilities to all employees and contractors.
- Implement robust reporting and escalation channels for suspected breaches or policy violations, directing reports to the DPO/DPC for swift response and escalation to senior management/Board for significant incidents.
- Establish clear accountability mechanisms, including performance metrics and potential disciplinary actions for non-compliance.

3. Legal Compliance & Core Principles

- Ensure all personal data processing activities strictly comply with the requirements of UAE PDPL (Federal Decree Law No. 45 of 2021).
- Establish and document a clear lawful basis (e.g., explicit consent, contractual necessity, legal obligation, legitimate interest) for every data processing activity before processing begins.
- Provide clear, concise, and easily accessible privacy notices to data subjects at or before the time of data collection, informing them about how their data will be processed.
- Implement strict data minimization practices: collect only the personal data that is adequate, relevant, and necessary for the specified, explicit, and legitimate purposes.
- Enforce purpose limitation: process personal data only for the purposes disclosed to the data subject and for which a lawful basis exists. Obtain additional consent for any new purposes.



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- Implement procedures to ensure the accuracy and integrity of personal data throughout its lifecycle, including mechanisms for data subjects to request corrections.
- Develop and manage a robust consent management process for obtaining, recording, and managing data subject consent (including withdrawal) where consent is the lawful basis.
- Continuously monitor UAE and relevant international data protection regulations and update policies/procedures accordingly. Maintain engagement with regulatory authorities as needed.

4. Data Security, Storage & Retention

- Implement and maintain appropriate technical and organizational security measures (commensurate with risk) to protect personal data against unauthorized access, disclosure, alteration, loss, or destruction (e.g., encryption, access controls, firewalls, secure protocols). Embed security by design.
- Define and document clear data retention schedules for different categories of personal data, based on legal requirements and legitimate business needs.
- Implement secure procedures for the disposal or anonymization/pseudonymization of personal data once the retention period expires or the data is no longer needed for its original purpose.

5. Data Subject Rights Management

- Establish clear, documented, and easily accessible procedures for data subjects to exercise their rights under PDPL (e.g., right to access, rectify, erase, restrict processing, data portability).
- Ensure mechanisms are in place to receive, verify, and respond to data subject requests promptly, securely, and within the timeframes stipulated by PDPL.
- Train relevant staff on how to handle data subject requests effectively and compliantly.

6. Data Breach Incident Response

- Develop, document, and regularly test a comprehensive Data Breach Incident Response Plan.
- Train all staff on how to identify and immediately report suspected data breaches through designated internal channels (to the DPO/DPC).
- Ensure the Incident Response Plan includes clear steps for containment, investigation, risk assessment, remediation, and documentation.
- Establish procedures for timely notification of data breaches to the relevant UAE regulatory authorities and affected data subjects, as required by PDPL.

7. Third-Party Management & Cross-Border Data Transfers

- Conduct thorough due diligence on all third-party vendors, partners, or processors before engaging them to handle personal data on MMT's behalf.
- Ensure legally sound contractual agreements (Data Processing Agreements) are in place with all third-party processors, clearly defining their data protection obligations, security requirements, audit rights, and breach notification duties.



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- Conduct periodic reviews or audits of third-party compliance with contractual and regulatory obligations.
- Implement appropriate safeguards (e.g., adequacy decisions, contractual clauses, consent) for any cross-border transfers of personal data outside the UAE, ensuring compliance with PDPL requirements for international data flows.

8. Training, Awareness & Culture

- Develop and implement a continuous, mandatory data protection training and awareness program for all employees and relevant contractors, tailored to their roles and responsibilities.
- Foster a strong organizational culture of data privacy and security awareness.
- Maintain records of all data protection training provided.

9. Monitoring, Auditing & Continuous Improvement

- Implement mechanisms for the continuous monitoring of data protection controls and practices.
- Conduct regular internal and external audits to assess compliance with this policy and applicable regulations, identify gaps, and verify the effectiveness of controls.
- Regularly review and update this Data Protection Policy and related procedures (at least annually or as needed) to reflect changes in laws, technology, business operations, or risks.
- Use audit findings, risk assessments, and benchmarking against best practices to drive continuous improvement initiatives.

10. Policy Interaction

- Ensure relevant staff understand that specific AML/CFT obligations or binding requests from UAE regulatory authorities may legally take precedence over certain data protection provisions, as outlined in section 8.6 of the policy.



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