Privacy & Cookies Policy

Last Updated: 20.08.2026

1. Introduction

Jabal Asset Management LLC ("Jabal", "we", "us" or "our") is committed to protecting your personal data in accordance with the Personal Data Protection Law of Oman, Royal Decree 6/2022 ("PDPL"), and its Executive Regulations.

This Privacy & Cookies Policy explains how we collect, use, share and protect your personal data when you interact with us through our mobile application ("App"), our website (https://jabal.om), or any related service channels.

2. Data Controller

- **Entity** — Jabal Asset Management LLC
- **Registered address** — North Al Khuwair, Muscat, Oman
- **Regulator** — Financial Services Authority of the Sultanate of Oman ("FSA")

3. Data Protection Officer

In compliance with Article 34 of the PDPL, we have appointed a Data Protection Officer ("DPO"). You may contact the DPO in respect of any privacy-related matter:

- **Name**: DPO officer
- **Email**: DPO@jabal.om

4. Scope

This Policy applies to your personal data when you:

- Access or use our mobile application;
- Visit our website at https://jabal.om;
- Open and operate a brokerage account with us, whether for MSX-listed securities or OTC equities;
- Subscribe to our asset management services;
- Use any digital advisory or profiling tools we make available;
- Otherwise communicate with us.

5. Personal Data We Collect

5.1 Data You Provide

- **Identity data** — name, civil ID number, passport details, date of birth, nationality, photograph.
- **Contact data** — postal address, email address, phone number.
- **Financial data** — bank account details, source of funds and source of wealth declarations, income and net worth information.

- **Investment data** — investment objectives, risk tolerance, investment experience, account preferences.
- **KYC / AML data** — tax residency, beneficial ownership information, sanctions screening data, FATCA and CRS declarations.

5.2 Data Collected Automatically

- **Technical data** — IP address, device identifier, operating system and version, browser type, time zone, app usage patterns.
- **Location data** — approximate geographic location based on IP address. Precise location is collected only with your explicit consent.
- **Cookie data** — see Section 14 below.

5.3 Data from Third Parties

We may receive information about you from:

- Identity verification and KYC service providers;
- Credit bureaus and sanctions screening databases;
- Other Jabal group entities, where you are a client of more than one entity;
- The Muscat Clearing and Depository Company ("MCDC") for the purpose of MSX account linkage.

6. How We Use Your Data (Purposes and Legal Bases)

Under the PDPL we process your personal data on one or more of the following legal bases:

Purpose	Legal Basis under PDPL
Performing our contract with you (account opening, executing trades, managing assets, reporting)	Performance of a contract
Verifying your identity and conducting KYC, AML and CTF screening	Compliance with legal obligation
Reporting to the FSA, Oman Tax Authority, Financial Intelligence Unit and other competent authorities	Compliance with legal obligation
FATCA and CRS reporting through the Oman Tax Authority	Compliance with legal obligation
Risk profiling and suitability assessment for asset management and advisory services	Performance of a contract, or your consent for profiling with significant effects (see Section 9)
Direct marketing	Your consent. You may withdraw at any time, including by using the unsubscribe link in any marketing email or by contacting us as described in Section 17.
Service improvement, analytics, security, and fraud prevention	Our legitimate interests

7. Who We Share Your Data With

We may share your personal data with:

- **Regulators and authorities** — the FSA, MSX, MCDC, the Oman Tax Authority, the Financial Intelligence Unit, the courts, and other competent authorities as required or permitted by Omani law;
- **Service providers and processors** — KYC and AML providers, IT and cloud infrastructure providers, customer support providers, audit firms, and other processors who act on our written instructions;
- **Banks and counterparties** — where necessary for settlement of transactions;
- **Other Jabal group entities** — for the purposes of managing the group relationship with you, subject to PDPL safeguards;
- **Transactional counterparties** — in the event of any sale, transfer or restructuring of Jabal's business, with appropriate confidentiality protections.

We do not sell your personal data to any third party.

8. Cross-Border Transfers

Where your personal data is transferred outside the Sultanate of Oman, we ensure that the transfer complies with Article 37 of the PDPL and is supported by appropriate technical and legal safeguards. Such transfers occur only where:

- the recipient jurisdiction provides an adequate level of data protection;
- we have your explicit consent to the transfer; or
- another lawful basis recognized by the PDPL applies.

9. Profiling and Automated Decision-Making

If you subscribe to our digital advisory or profiling tool, we may carry out profiling within the meaning of the PDPL — that is, automated processing of your data to evaluate your investment profile, risk tolerance or suitability for particular products.

Where profiling produces legal effects or similarly significant effects for you, we will obtain your separate, explicit consent before carrying out that profiling. The specific terms governing the profiling tool are set out in the separate Profiling Tool Consent presented to you at the point of subscription.

You have the right at any time to:

- Request human review of any automated decision affecting you;
- Express your point of view on the decision and contest it;
- Withdraw your consent to profiling.

10. Your Rights under the PDPL

Under Article 16 of the PDPL, you have the following rights:

- **Right of access** — to obtain a copy of your personal data and information about how it is processed.
- **Right to rectification** — to correct inaccurate or incomplete data.

- **Right to erasure** — to request deletion of your data where the purpose has been fulfilled or where you withdraw consent, subject to our regulatory retention obligations (see Section 13).
- **Right to withdraw consent** — to revoke consent for any processing based on consent, at any time, without affecting the lawfulness of prior processing.
- **Right to data portability** — to receive your data in a structured, machine-readable format, or have it transferred to another controller, where technically feasible.
- **Right to be notified of a breach** — to be informed where a breach poses a high risk to your rights and freedoms.
- **Right to object** — to processing based on legitimate interests or for direct marketing.
- **Right to lodge a complaint** — with the Ministry of Transport, Communications and Information Technology ("MoTCIT") as the competent supervisory authority under the PDPL.

11. How to Exercise Your Rights

To exercise any of these rights, please contact the DPO using the details in Section 3. We will respond to your request within forty-five (45) days, as required by the PDPL.

12. Data Security and Breach Notification

We maintain appropriate administrative, technical and physical safeguards designed to protect your personal data, including encryption, access controls, and regular security review.

In the event of a personal data breach, we will:

- Notify MoTCIT within seventy-two (72) hours of becoming aware of the breach, as required by the PDPL;
- Notify affected data subjects without undue delay where the breach poses a high risk to their rights and freedoms.

We will never ask for your password, PIN or other confidential authentication information by email or unsolicited phone call.

13. Retention

We retain your personal data only for as long as necessary for the purposes for which it was collected, and to comply with our legal and regulatory obligations. Specifically:

- Account and transaction records are retained for up to ten (10) years after the end of the service relationship, in line with AML and CFT and FSA record-keeping requirements;
- Marketing data is retained until you withdraw consent;
- Technical and analytics data is retained for ten (10) years

After the applicable retention period, data is securely deleted or irreversibly anonymised.

14. Cookies

Our website uses cookies to enable functionality and improve your experience.

14.1 What are cookies?

Cookies are small text files placed on your device when you visit a website. They may be:

- **Session cookies** — deleted when you close your browser;
- **Persistent cookies** — remain on your device for a set period;
- **First-party cookies** — set by jabal.om;
- **Third-party cookies** — set by other domains whose content is embedded in our website.

14.2 How we use cookies

- **Essential cookies** — necessary for website functionality (e.g., secure login, session management). These cannot be disabled.
- **Analytical cookies** — help us understand how visitors use the site, so we can improve it.
- **Marketing cookies** — used to deliver relevant advertising and measure campaign effectiveness. Only set with your consent.

14.3 Managing cookies

You can manage cookies through your browser settings. Disabling certain cookies may affect website functionality. For browser-specific guidance, refer to the help section of your browser.

15. Changes to this Policy

We may update this Policy from time to time. Material changes will be notified to you through the App and posted on jabal.om. The "Last Updated" date at the top of this Policy reflects the most recent version.

16. Marketing Communications

Where we send you marketing communications on the basis of your consent, you may withdraw your consent at any time. Each marketing email we send contains an unsubscribe link that allows you to opt out of further marketing communications. You may also opt out by contacting us as described in Section 17. Opting out of marketing communications does not affect communications relating to your account or services, which we are required or permitted to send to you under applicable law or our agreement with you.

17. Contact Us

For general enquiries about our services, please contact us through the Contact Us page on jabal.om or through the channels published from time to time on the website and in the App.

For privacy-related matters specifically (including to exercise any of the rights set out in Section 10), please contact the DPO using the details in Section 3.