

# PRIVACY & COOKIES POLICY

Last updated: February, 2026

**Cusp Wealth Ltd** ("Cusp Wealth", "we", "us") is committed to protecting and respecting your personal data. We strive to ensure that when you choose to use our services, you understand what data we collect about you, as well as how we use and protect that data.

Cusp Wealth Ltd, a company duly incorporated and existing under the laws of the Dubai International Financial Centre ("DIFC"), holds commercial license number 10863, with its registered office at Gate District 04, Level 06, Office 17, DIFC, Dubai, United Arab Emirates. Cusp Wealth is authorised and regulated by the Dubai Financial Services Authority ("DFSA") pursuant to a Category 4 License, inclusive of Retail Client and Islamic Endorsements.

As an entity registered in the DIFC under the DFSA Category 4 license, Cusp Wealth will comply with the DIFC Data Protection Law No. 5 of 2020 (the "DP Law"). In certain cases, we may also be subject to privacy laws from other jurisdictions.

This Privacy Policy outlines how Cusp Wealth respects the privacy of its users. In compliance with the DP Law and as set forth in our Terms and Conditions, Cusp Wealth collects information about you when you access or use our online services, including the Cusp Wealth Mobile Application (the "App"). This Privacy Policy sets out the basis on which we will process any information, including any personal data, that you provide to us. By using our App, you consent to the practices described in this Privacy Policy. Please take the time to read it carefully.

This Privacy Policy provides information on how we collect and process your personal data when you use our services and App, applicable to individuals worldwide who access or use Cusp Wealth's services ("Users").

This Policy may be made available in several languages; all versions are legally binding, but in the event of inconsistency between the English version and a translated version, the English version prevails.

## Definitions

**"Account"** refers to the registered account created by the User on the App.

**"Third-Party Service Provider"** refers to external service providers and third parties with whom Cusp Wealth has entered into service agreements to expand the range of services and products available to Users and community members through the Cusp Wealth App. Each Third-Party Service Provider operates independently and is governed by its own terms and policies. Cusp Wealth does not exercise control or management over these third-party websites or services.

Users are responsible for exercising due diligence in reviewing and understanding the legal documentation governing the products and services offered by such providers.

**“Personal Data”** means any information relating directly or indirectly to a natural person, whether living or deceased, who is identified or identifiable from that information alone or in combination with other information.

**“User”** refers to any natural or legal person who accesses and creates an Account on the Cusp Wealth App in accordance with applicable terms and conditions, using any technological device that enables the reading, listening, and/or viewing of information on the App, as well as actively or passively interacting with such information.

### **Purpose of the Policy**

We at Cusp Wealth know and understand how important it is for you to understand how we collect, store, process, share, and use your Personal Data. We respect and protect the privacy of our Users' Personal Data in our App.

The purpose of this Policy is to describe how we collect, process, and manage Users' Personal Data through the App, which is developed to offer our services.

### **Acceptance**

By accessing and using our App, you consent to and accept the terms of this Policy, the Terms and Conditions of the service, and any other supplementing documentation provided related to the present document. If you do not agree or consent to receive our cookies, then this may in some cases preclude you from using the App, or Services, or negatively affect the display or function thereof.

In any case, **Cusp Wealth** will not hold any responsibility for any errors, bugs, or malfunctions on the App regarding the information displayed and/or its functions, caused by your lack of consent to receive our cookies.

### **User Login Credential Information**

Users grant **Cusp Wealth** permission to use their data and information as required to create and maintain an Account on the App. This information includes name, email address, contact details, and any other relevant information as specifically detailed in this Policy, required for account registration and management.

Users acknowledge that **Cusp Wealth** will use the provided Personal Data to generate login credentials, such as username and password, for accessing the App. These login credentials will enable Users to access the various Services provided by Third Party Service Providers through the App.

**DATA CONTROLLER:**

Cusp Wealth  
Dubai International Financial Centre, Dubai,  
United Arab Emirates

**Cusp Wealth** is a wealthtech platform that offers online financial services, including but not limited to the regulated activities of Arranging Deals in Investments and Advising on Financial Products. Through its mobile application, Cusp Wealth facilitates access for retail investors to a range of asset classes, enabling them to make informed investment decisions in a safeguarded and compliant digital environment.

**The Data We Collect About You**

You may provide information by completing forms on our App or by communicating with us through chat, telephone, e-mail, or any other electronic or digital means. This includes providing information when registering via the client portal provided by Cusp Wealth, downloading and registering to use the App, or interacting with the App through supported digital channels. You may also submit information through the App's integrated features, such as social sharing tools, or when reporting technical or functional issues.

If you contact us, Cusp Wealth will maintain an electronic record of such correspondence, which may include personal information provided at the time. The personal information you provide may include, but is not limited to: your name, address, e-mail address, telephone number, device-related information, username, password, residential or work address, photograph, and other registration details you voluntarily submit ("Personal Information" or "Personal Data"). It may also encompass financial details such as account balances and transaction-related data, including the transaction value, merchant information, merchant category, payment method, and the date and time of each transaction.

Cusp Wealth collects and processes Personal Data for specified and lawful purposes, which include compliance with applicable legal obligations such as anti-money laundering regulations. We may also process your data where it is necessary for entering into a contract with you, for the performance of a contract to which you are a party, or where required to carry out tasks in Cusp Wealth's legitimate interests. Certain data may be mandatory. In cases where the provision of your Personal Information is legally required or otherwise mandatory, you will be informed of the consequences of withholding such data.

Unless explicitly requested for a lawful and specific purpose by Cusp Wealth, users are strictly prohibited from submitting content or contact information relating to or concerning minors.

**Cookies**

Cusp Wealth uses cookies to track site usage and enhance the user experience. Cookies are small text files unique to your device, allowing us to retain preferences.

Whenever you visit our App, Cusp Wealth will send a Cookie to the device you are using to access our App, who may place tracking technologies on your device, browser, or the webpage you are viewing, in order to personalise your experience, understand usage patterns, provide, improve, and secure our App. Your device automatically stores the Cookie in a file located within your browser allowing us to recognise your device upon future access. Cookies set by our operators are called "First party cookies". Cookies set by parties other than our Apps are called "Third-party cookies". Third-party cookies enable third-party features or functionality to be provided on or through the website, for instance, such as advertising, interactive content, and analytics.

We use Cookies to:

- Optimise your trading experience, including remembering your preferences, location, preferred language, browser and other details;
- Authenticate your identity for security purposes;
- Maintain our App and certain functions available on it;
- Analyse and track the use of our Services;
- Adjust our App according to your trading habits and our regulatory requirements.

Cusp Wealth uses the following Cookies to operate the App:

- Essential Cookies are known as strictly necessary Cookies for you to browse our App and use its features, such as accessing secure areas of our App. These Cookies are generally First-Party Session Cookies. These Cookies do not require consent from you. Essential Cookies help to make our App easy to use by providing basic functions such as page navigation, language selections, authorisation, and filling in forms. Our App will not function without these Cookies and they cannot be disabled. These Cookies do not reveal the User's identity or collect information. They are stored on the User's device until the browser is closed.
- Session Cookies are temporary and expire once you close your browser. It stores information for the time, or session when you are on our App.
- First-party-cookies are placed on your device directly by the App you are visiting.
- Third-party cookies are placed on your device, not by our App, but by a third party like an advertiser or an analytic system. Generally, Third-Party Cookies consist of tracking Cookies used to identify online behaviour, understand interests, and then customise advertising the User on other websites. Any information obtained from Third-Party Cookies is processed by the respective collaborative partners.
- Persistent Cookies encompass all Cookies that remain on your hard drive until you erase them or your browser does it. It depends on the Cookie's expiration date. All persistent Cookies have an expiration date written into their code, but their duration can vary.
- Google Analytics Cookies to measure our User's interactions with the content on our App. These Cookies collect information about your interactions with our App, such as unique visits, repeat visits, session duration, and App activity.
- Functionality Cookies allow our App to remember choices you have made in the past like what language you prefer, what region you would like, or what username and password are so you can automatically log in. We use Cookies for navigation and to facilitate your access to and use of this site. These Cookies are necessary for the transmission of communications

on the network or to supply services whatever requested by you. Further, they help us to know which pages are the most and least popular and see how visitors move around the App.

- Performance Cookies collect information about how you use our App, like which page you visited and which link you clicked on. None of this type of information can be used to identify you. The sole purpose of Performance Cookies is to improve our App functions. Analytics may collect information through log data, such as; (i) IP address, (ii) Type of browser and device, (iii) Operating system, (iv) Name of the Internet Service Provider, (v) Country information, (vi) Date and time of visit, (vii) Web page origin and exit.
- Marketing Cookies track your online activity to help advertisers deliver more relevant advertising or to limit how many times you see an ad. These Cookies can share information with other organisations or advertisers. However, these are Persistent Cookies which are third-party-proven. These Cookies may be set through the website by our advertising partners. If you do not allow these Cookies, you will experience less targeted advertising.
- You reserve the right to decide whether to accept or reject Cookies from our App. You can exercise your Cookie rights by setting your preferences when accessing our website. However, you will not be able to reject the Essential Cookies and still access the App, as they are strictly necessary to provide you with our services on our App. In the event you choose to reject certain Cookies, you may still use our App, though your access to some functionality and areas of our App may be restricted. You may also set or amend your web browser controls to accept or refuse Cookies.

You can adjust your settings to manage cookies, but this may limit your access to certain areas of our website.

## **Use of Personal Data**

Cusp Wealth may use the Personal Data you provide, or that is collected from you, for purposes that are lawful and necessary for the operation and improvement of our App and related services. This includes facilitating payment processing, issuing transaction confirmations, delivering requested products or services and providing associated information, developing new functionalities, offering customer support, verifying user identities, issuing administrative communications, and contacting you—when appropriate— to request service-related feedback.

Furthermore, your Personal Data may be processed to support internal functions such as fraud prevention, detection and mitigation of misuse, resolution of software issues, performance of data analysis, testing, and research, as well as to monitor and evaluate trends related to user behaviour and usage patterns.

Cusp Wealth may also contact you with information we consider relevant or beneficial, including details about services, promotional offers, updates, and corporate communications. You may additionally be informed about opportunities to participate in surveys, promotional activities, or contests, and we may process your data for the purpose of fulfilling such activities.

We may also use your Personal Data to inform you of any changes to the App, or any new functionalities or updates made available. The data you provide may also be used to enable participation in interactive features offered through the App. To maintain the security and integrity of the App and the services offered, and to personalise your user experience through recommendations, suggested content, or relevant service offerings, your Personal Data may be utilised accordingly.

## **Processing, Storage, and Transfer of Personal Data**

Cusp Wealth will take all reasonably necessary measures to ensure that your Personal Data is processed fairly, lawfully, and in accordance with applicable data protection legislation, including the DIFC Data Protection Law (DP Law), and other relevant legal and regulatory requirements.

By submitting your Personal Data—including but not limited to device-related data, log information, and demographic details—you consent to the processing, transfer, and storage of such data for the purpose of enabling Cusp Wealth to fulfil its administrative, regulatory, and business functions. These functions may include responding to inquiries submitted via the App, maintaining communication records, and supporting future lawful informational or promotional activities.

Unless otherwise expressly notified, Cusp Wealth does not ordinarily engage in automated decision-making in connection with the processing of Personal Data.

You acknowledge and agree that Cusp Wealth may transfer, store, and process your Personal Data within the United Arab Emirates and, where necessary or appropriate, in jurisdictions outside of the UAE. Some of these jurisdictions may not provide the same level of data protection as your country of residence. In such cases, Cusp Wealth will implement adequate safeguards and maintain strict data protection and information security measures to ensure the confidentiality and integrity of your Personal Data, in line with this Privacy Policy and applicable law.

To support database integrity, fulfil operational requirements, conduct research, perform analytics, and ensure ongoing regulatory compliance, Cusp Wealth retains Personal Data for a reasonable period of time unless otherwise required by law. You remain responsible for the accuracy of the Personal Data you provide, and Cusp Wealth will update or amend such information upon your written request, as described in the applicable data rights section.

Cusp Wealth will archive or permanently delete your Personal Data from active use upon request, except where retention is required under applicable law, regulatory obligations, or to fulfil existing contractual or service obligations.

By accessing or using the App, you represent and warrant that you understand and accept that any Personal Data submitted through the App or otherwise communicated to Cusp Wealth will be processed in accordance with this Privacy Policy and applicable legal standards.

## Information Collected About You and Your Device

Each time you access or use the App, Cusp Wealth may automatically collect the following categories of data:

- **Device Information:** Including but not limited to the type and model of your mobile device, unique device identifiers, network information, operating system, browser type, device token, device settings, and time zone configuration.
- **Log Information:** Details concerning your usage of the App, such as traffic data, communication logs, resource access details, and other user interaction data.
- **Location Information:** Where permitted and applicable, the App may utilise GPS or similar technologies to determine your geographic location. Use of this feature may require your explicit consent. You may revoke or modify such consent through your device's location settings at any time.

In addition to the categories of Personal Data above, Cusp Wealth may collect further demographic and behavioral data through your use of the App. This may include, but is not limited to, your postal code, city of residence, gender, username, mobile network information, IP address, SMS metadata, transaction history, birth date or age, browsing behaviour, search history, and registration history

## Sharing of Personal Data

Cusp Wealth may share your Personal Data in accordance with this Privacy Policy and as permitted by applicable law. Such sharing may occur with Third Party Service Providers engaged by Cusp Wealth to facilitate the provision of services requested by you, including promotional arrangements and partnership-based services. Your data may also be shared with third parties where you have explicitly authorised such sharing, such as through integrations with external services or platforms.

Specifically, regarding your mobile contact information, we do not share it with third parties or affiliates for marketing or promotional purposes. Especially, text-messaging opt-in records obtained from the App and your consent details are excluded from all other data categories that may be shared and will not be disclosed to any third parties other than the Third Party Service Providers mentioned above (e.g., customer service agents).

Additionally, your Personal Data may be disclosed to affiliates or subsidiaries of Cusp Wealth, its parent company, and to consultants, vendors, marketing and advertising partners, and service providers who require access to such information in order to carry out services on our behalf or fulfil contractual obligations.

Cusp Wealth may disclose your Personal Data to competent authorities, regulatory bodies, or legal entities upon valid legal request or where disclosure is required to comply with applicable laws and regulations. Personal Data may also be shared with law enforcement agencies, governmental bodies, or other relevant authorities where necessary.

In the event of a business transaction involving merger, acquisition, restructuring, financing, or sale of assets, your Personal Data may be shared with relevant third parties during the course of negotiations or execution of such transactions.

Where legally required or where your consent has been provided, Cusp Wealth may also share Personal Data accordingly. Additionally, we may disclose anonymised or aggregated data that cannot reasonably identify you to third parties for analytical, research, or statistical purposes.

Each Third Party Service Provider may have its own data transfer clauses, terms of use, and privacy policies governing how your information is handled, processed, and shared. Cusp Wealth is advising you to consult the respective privacy policies of the Third Party Service Provider for more detailed information. It may include their practices and instructions about how to opt-out of certain options. By using our App to access the services of Third Party Service Providers, you acknowledge and agree to adhere to the data transfer clauses and privacy policies of those Third Party Service Providers.

Cusp Wealth is not liable for any disparities in eligibility criteria among Third Party Service Providers. Users are encouraged to directly contact the relevant Third Party Service Provider for clarifications on their access policies. User's access to any Third Party Service Provider through our App is contingent upon the User's compliance with the respective Third Party Service Provider's applicable terms, conditions, laws and regulations.

We do not ordinarily engage in automated decision-making processes. Data shared with third parties will be protected with appropriate safeguards.

## **Your Rights and Choices**

You have the right to object to the processing of your Personal Data for marketing purposes. Cusp Wealth respects your right to opt out of receiving marketing communications and to request the removal of your data from our marketing database. While we will honor such requests, we may continue to send you transactional or service-related communications, such as payment confirmations or notifications essential to the services you receive.

If your Personal Data is also stored in databases of third-party providers due to your interactions with their services, you are responsible for submitting opt-out or removal requests directly to those third parties.

Under the DP Law and other applicable legislation, you have the right to access your Personal Data held by Cusp Wealth. Subject to verification, you may submit an access request, which will typically be processed free of charge unless the request is manifestly unfounded or excessive. In such cases, Cusp Wealth may charge a reasonable fee or decline to act.

If you identify an inaccuracy in your Personal Data, you may submit a correction request. Once verified, Cusp Wealth will rectify the data and, where applicable, notify third parties known to have received the incorrect data, although full update of external databases may depend on the respective third parties' own update schedules.

You have the right to request the restriction of processing of your Personal Data under certain conditions, including where you dispute the accuracy of the data, object to deletion but require limited processing, or request data retention for legal reasons. In such cases, Cusp Wealth will restrict data processing to storage, unless further processing is legally required.

You may also request the erasure of your Personal Data, commonly known as the “right to be forgotten.” This right applies where Cusp Wealth no longer has a lawful reason to retain your data, subject to exceptions such as legal obligations or pending claims. Cusp Wealth will comply with all valid erasure requests in accordance with the DP Law.

You have the right to receive your Personal Data, where such data was provided by you and processed based on your consent or contractual necessity, in a structured, commonly used, and machine-readable format.

Where Cusp Wealth relies on your consent to process your Personal Data, you may withdraw such consent at any time. Revocation of consent will not affect the lawfulness of processing carried out prior to the withdrawal. To exercise any of your rights, you may contact Cusp Wealth using the contact details provided in this Privacy Policy.

## **Security Precautions**

Cusp Wealth has established robust policies and procedures to protect your personal data against unauthorised access. Our practices include:

- Data encryption and access controls.
- Employee training on data privacy.
- Monitoring and auditing of systems for potential vulnerabilities.

No data transmission over the internet is completely secure; therefore, while we take reasonable measures to protect your data, we cannot guarantee its absolute security.

## **External Links**

Our App may contain links to third-party websites. We are not responsible for the content or privacy practices of these sites, and accessing them is at your own risk.

## **Changes to This Privacy Policy**

We may update this Privacy Policy periodically. If significant changes are made, we will notify you through our App or website. Continued use of our services after changes are posted constitutes acceptance.

## **Contact Us**

For questions, comments, or complaints related to our Privacy Policy, please contact:

**Cusp Wealth**

DIFC, Dubai, UAE

**Email:** [legal@cuspwealth.com](mailto:legal@cuspwealth.com)

If you believe your data has been mishandled, you may also contact the **DIFC Commissioner of Data Protection:**

**DIFC Data Protection Office**

Level 14, The Gate Building, DIFC, UAE

**Email:** [commissioner@dp.difc.ae](mailto:commissioner@dp.difc.ae)

**Phone:** +971 4 362 2222