ARCHWAY
INVESTMENTS

Privacy Policy

Last updated: 10 November 2026

This Privacy Policy explains how Archway Investments Ltd ("Archway Investments", "we", "us") handles personal data in connection with this website and correspondence sent to us.

Who we are

Archway Investments Ltd is a private company registered in the Dubai International Financial Centre (DIFC), United Arab Emirates, under Commercial Licence CL10166. We are responsible for the personal data described in this policy and process it in accordance with the DIFC Data Protection Law (DIFC Law No. 5 of 2020) and other applicable laws. Archway Investments Ltd is the controller for the processing described in this notice.

What personal data we collect

This website has no contact forms, user accounts, newsletters or analytics. We collect personal data only in the following situations:

- **When you contact us.** If you email us, we receive your name, contact details, the content of your message and any attachments, such as investment, co-investment or partnership proposals.
- **When you visit the website.** To deliver the pages, our hosting provider and font provider automatically process limited technical data, such as your IP address, browser type, device information and the time of your visit.

We may receive business contact details and other information relevant to an enquiry or proposal from your organization, another participant in a proposed transaction or a professional adviser. Providing information in a general enquiry is voluntary. If we need particular information to respond or proceed, we will explain what is required and the consequences of withholding it.

We do not ask for, and ask you not to send us, sensitive personal data (for example, health information or official identification documents) unless we specifically request it as part of a transaction.

How we use personal data

We use personal data to:

- respond to enquiries and evaluate proposals sent to us;
- manage our business relationships and keep appropriate records;
- comply with legal and regulatory obligations, including anti-money laundering and know-your-customer requirements where a transaction proceeds;
- operate, maintain and secure the website.

Where necessary for these purposes, we rely on our legitimate interests in assessing potential investments, managing our business relationships and protecting our website. Where necessary, we process personal data to perform a contract with you or take steps at your request before entering

into a contract with you and to comply with legal obligations. We do not sell personal data, use it for marketing profiling or make decisions about you based solely on automated processing.

Who we share personal data with

We share personal data only where necessary, with:

- professional advisers, such as legal, tax and audit firms;
- service providers acting on our behalf, such as IT, email and website hosting providers;
- courts, regulators and other authorities where required by law.

This website loads fonts from Google Fonts, a service of Google. When your browser requests the fonts, Google receives technical data such as your IP address. Google's processing is governed by Google's own privacy policy.

International transfers

Our service providers and advisers may be located outside the DIFC. Where personal data is transferred to a jurisdiction that is not recognised as providing an adequate level of protection, we apply appropriate safeguards as required by the DIFC Data Protection Law.

How long we keep personal data

We keep personal data only for as long as necessary for the purposes described above, including any period required by law or regulation. Proposals that we decide not to pursue are deleted within a reasonable period. We may retain relevant records for longer where required by law or necessary to establish, exercise or defend legal claims.

Security

We use appropriate technical and organisational measures to protect personal data against unauthorised access, loss or misuse, and limit access to those who need it.

Your rights

Subject to applicable law, you may request access to your personal data, ask us to correct or delete it, restrict or object to its processing, or receive a copy of it in a portable format. Where we rely on your consent, you may withdraw it at any time.

To exercise these rights, contact us at privacy@archway.ae. If you are not satisfied with our response, you may lodge a complaint with the Commissioner of Data Protection of the DIFC.

Changes to this policy

We may update this policy from time to time. The current version is always available on this website, with the date of the latest update shown above.

Contact

If you have any questions about this policy, please contact us at privacy@archway.ae

You can also contact our Data Protection Officer, Vladislav Sinani, at vlad.sinani@archway.ae