1. General Terms and Conditions

- **1.1** In accordance with the stated privacy terms, the privacy on this website and mobile application, including the materials and services available on or through it, is regulated by 'the website and mobile application', 'the Pinnacle Platform, or 'Pinnacle Capital'. The laws of the Kingdom of Saudi Arabia complement it where not explicitly stated. Users must read the privacy policy carefully before using the website and mobile application. Accessing the website and mobile application by the user constitutes unconditional acceptance and commitment to the privacy policy.",
- **1.2** By starting to use this site, you agree to abide by the mentioned privacy terms and conditions ("Privacy Policy").
- **1.3** Pinnacle Capital reserves the right to modify or change these terms and conditions for the Privacy Policy at any time it deems appropriate. Therefore, it is advised to regularly review the policy to get the latest information. Users are advised to periodically review the Privacy Policy to stay informed about the latest updates and changes. Privacy Policy

2. Data Protection

- **2.1** Data protection is of utmost priority for Pinnacle Capital. The data protection policy covers the types of information the Pinnacle Platform collects from our website and mobile application users, the company's actions regarding this information, and how to access the information available through the Pinnacle Platform.
- $\star\star 2.2\star\star$ Users should regularly review the data protection policy, as it may change from time to time.

3. Use of Data

- **3.1** The user fully consents to Pinnacle Capital when storing data in their profile and authorizes the company to use that data and provide it to the listed funds in which the user invests, and to payment service providers for the listed funds or for the purpose of paying amounts due to users from their investments. This data includes, but is not limited to:
- First and last name, email address, phone number, permanent address (including city, postal code, and country), personal identification number, gender, date of birth, nationality, investment amount, bank account number (IBAN), and other banking information (BIC).
- Using your personal data to inform you of any changes in your account or on the Pinnacle Platform.
- Customer surveys and evaluations of products and services.

- To prevent crimes and assist in their detection, investigation, and prosecution.
- KYC (Know Your Customer) and AML (Anti-Money Laundering) assessments.
- Any other data related to the user's relationship with the Pinnacle Platform, including management, accounting, billing, auditing, and other legal purposes.
- **3.2** Conducting statistics on the Pinnacle Platforms dealings from visitors and users and traffic activity on our website and mobile application. In these cases, the data is anonymized and cannot identify your personal identity.
- **3.3** In cases of not unsubscribing, the company may also use your personal data to keep you informed about the Pinnacle Platforms services and related products.
- **3.4** It should be noted that the information collected is not for the purpose of identifying individuals but is used for statistical purposes and to improve the attractiveness, content, and functionality of our site (Pinnacle Capital) according to all regulations and laws related to data protection.
- #### 4. Collection and Processing of Personal Data
- **4.1** In some cases, users will be required to provide necessary data for providing services and information.
- **4.2** This includes logging in and providing us with user information such as name, job title, email address, etc., and in this case, the site cannot be browsed in incognito mode.
- **4.3** We may also request additional information, such as name, address, and bank details, when requesting an investment or using certain services available through the website and mobile application.
- **4.4** Information about the user may also be requested when writing comments or participating in surveys (questionnaires).
- **4.5** All information on the Pinnacle Platform is confidential and will not be disclosed or dealt with by any third party or by persons receiving instructions from Pinnacle Capital except with explicit consent from the user, including service providers receiving instructions from the company.
- **4.6** Personal information includes all data we hold or collect about you, whether related to your personal details, transactions, financial information, or interactions, whether direct or indirect (via cookies or similar means). This also includes data we obtain from third parties, as well as information collected when you use our site.

4.7 When you visit the Pinnacle Platform, your Internet Protocol (IP) address, the date and time of the visit, and the URL of the site you were referred from to the platform are recorded. Most websites and mobile applications place a small file called 'cookies' on the visitor's hard drive (browser) upon visiting. Cookies are text files containing information that allows the site that deposited them to retrieve them when needed during the user's next visit to the site.

5. Use of Personal Data

- **5.1** We use the personal data we collect to provide the services and information requested by users.
- **5.2** We may use personal data to improve and develop our platform and customize it according to users' needs.
- **5.3** We may use personal data to communicate with users and inform them of updates, offers, and news related to our services.
- **5.4** We may use personal data for marketing purposes, such as sending promotional emails or special offers, based on prior consent from the user.
- **5.5** We may use personal data for statistical and analytical purposes to understand users' use of the platform and improve it.
- **5.6** We may use personal data to comply with applicable laws and regulations and to protect our legal rights and interests.

6. Retention of Personal Data

- **6.1** Personal data is retained for a limited period according to the purposes for which the data was collected and in accordance with applicable legal requirements.
- **6.2** We retain personal data securely and with appropriate technology to prevent unauthorized access, use, or disclosure.
- **6.3** We retain personal data for the necessary period to achieve the purposes for which the data was collected, including the period required to comply with applicable laws and regulations and to protect our legal rights and interests.

7. Sharing Personal Data

7.1 We do not sell or trade personal data to third parties without explicit consent from users.

- **7.2** We may share personal data with approved third parties in accordance with applicable laws and regulations, such as judicial, administrative, or regulatory bodies.
- **7.3** We may share personal data with service providers working with the company in accordance with laws and regulations.

8. Cookies

- **8.1** Cookies are used by Pinnacle Capital for various purposes, including:
- Improving the site usage experience and customizing products and services according to the company's and customers' needs.
- Collecting statistics about site use by anonymous users to understand how visitors use the site and improve its structure and content. user identity cannot be personally identified through this information, and users can choose not to use cookies.
- Remembering the username and password.
- Installing page settings if available on Pinnacle Platform.
- Installing the user's preferred colors.
- preventing the same user from voting multiple times in voting cases.
- Detecting returning users through cookies to enhance their experience, with the site reserving the right to modify or add information in cookies on each visit.
- **8.2** Users bear full responsibility for the accuracy and correctness of the data they send through the Pinnacle Platform.
- #### 9. Use and Sharing of Information
- **9.1** When the user provides their information to Pinnacle Capital, that information is used to provide products and services, and sometimes personal information is shared with companies affiliated with Pinnacle Capital for the purpose of communicating with the user.
- #### 10. Public Profile Information
- **10.1** Pinnacle Capital has the right to share the user's public account information with third parties for marketing purposes, provided that the third party complies with the specified terms and conditions when using that information. Pinnacle Capital commits not to publish the user's public account information if the user refuses to publish their public account information to other parties.

11. Data Retention

 $^{\star\star}11.1^{\star\star}$ Pinnacle Capital retains personal data as long as necessary to perform the service requested by the user or based on the user's permission.

11.2 The Pinnacle Platform may contain electronic links to other websites and mobile applications, pages, or portals, and those sites may use different methods for protecting information and privacy. The company notes that we are not responsible for the content and privacy policies followed by those other sites, and we advise you to review their privacy notices.

12. Security

- **12.1** Pinnacle Capital provides all necessary technical and organizational security precautions and measures to protect the available information from manipulation, assault, loss, damage, or unauthorized access by unauthorized persons. Security measures are continuously reviewed and updated to keep up with the latest technologies.
- #### 13. Access to Information and Correction
- **13.1** The user has the right to access all personal data stored and request its review and revision, and in the case of necessary need and after the company's approval, request modification or deletion.
- #### 14. Account Security
- **14.1** In case of failure to access the account after four incorrect attempts, the account on the Pinnacle Platform will be locked to reduce the risk of account breaches, and the account will remain locked for 60 minutes, then automatically reopened.
- #### 15. Securing Transactions on the Pinnacle Platform
- **15.1** The Pinnacle Platform uses advanced encryption technologies to secure transactions and sensitive information.
- **15.2** Financial transactions are conducted through trusted and certified payment gateways and with advanced security means using public and private keys, where the public key is used to encrypt information and the user can use the private key to decrypt it, after which the user can start conducting secure transactions that ensure the integrity and privacy of messages.
- **15.3** A continuous monitoring system is provided to check for illegal activities or cyber-attacks and take necessary measures to prevent and address them. If the user discovers any potentially fraudulent activity on the credit card, please promptly contact the bank associated with that credit card and inform them.

16. Page Security Laws

- **16.1** It is prohibited for any user or visitor to hack or attempt to hack the security systems on the site or Pinnacle Platform. Hacking or hacking attempts include, but are not limited to, the following:
- Accessing or attempting to access information or data not belonging to the user, or logging into an unauthorized account.
- Any attempt to view users' personal data or financial accounts, as well as attempting to explore or test the strength or weakness of the network system, breach network security or authentication system without prior permission, or attempt to interfere with another user, host, or network. The person responsible for violating network security or the system will be subject to criminal or civil prosecution, and cPinnacle Capital will make every possible effort to track and follow up on any system or security violation and apply laws to violators in cooperation with the courts of the violator's country.

17. Secure E-commerce

17.1 Since e-commerce and internet communications rely on and depend on the secure transmission of confidential information over public networks, Pinnacle Capital may rely on third-party licensed encryption and authentication technology to provide security and authentication technology for secure information transfer processes. However, it should be noted that despite advances in computer capabilities and new discoveries in the field of encryption and other cyber developments, it is not possible to guarantee that the technology used by Pinnacle Capital to secure its customers' information will not be breached, nor does the security system used by Pinnacle Capital, which is considered the best in practical reality, guarantee that no breach will occur.

18. Confidentiality of Information

- **18.1** All data, personal information, business information, and project-specific information are highly confidential at Pinnacle Capital. Users and investors are obligated to maintain the confidentiality of the information and data they provide. Investors and project supporters commit to maintaining the confidentiality of the information and data they receive from any party through the site. It is strictly prohibited for investors and project supporters to disclose, distribute, or share that information in any form with any other parties. Projects bear full responsibility for all activities conducted using the approved username and password. Users are also required to comply with the following procedures:
- Immediately report to Pinnacle Capital any unauthorized use of the username or password or any attempt to breach security or the account. Log out every time after using the account, resulting in Pinnacle Capital not being responsible for any losses or damages resulting from non-compliance with these terms and conditions.

19. Preventive Measures to Prevent Information Leakage

19.1 The term 'preventive measures to prevent information leakage' refers to the written policies and procedures adopted by Pinnacle Capital

to maintain the confidentiality of information and data or internal information obtained by Pinnacle Capital in the course of its business.

19.2 These measures aim to ensure that information is available only to company employees authorized to access it and not disclosed to anyone else. Pinnacle Capital will adopt appropriate and suitable preventive measures for the nature, size, and diversity of its business.

20. Reporting Security Violations

20.1 Users are obligated to report to Pinnacle Capital any incident or suspicious event involving unauthorized access, disclosure, modification, loss, damage, or harm to information.

21. Monitoring

21.1 Pinnacle Capital has the right to monitor, examine, preserve, read, copy, store, and resend all electronic communications and content submitted during the daily operations conducted by employees and agents of Pinnacle Capital authorized in performing their duties and tasks. Cooperation with law enforcement and judicial authorities may occur to assist in investigating a potential violation. This includes the possibility of examining electronic communications and content using electronic examination means. Additionally, Pinnacle Capital reserves the full right to refuse any electronic communications or content it deems incompatible with the policies and procedures adopted by Pinnacle Capital.

Risk of Using the Internet

While Pinnacle Capital employs advanced security measures to protect your personal data, the transmission of information over the internet is inherently risky. Users should be aware of the following potential risks:

- 1. Unauthorized Access: Despite our best efforts, unauthorized third parties may attempt to access your personal data.
- 2. Data Interception: Data sent over the internet can potentially be intercepted by malicious actors.
- 3. Phishing and Scams: Be cautious of phishing attempts and scams that may attempt to trick you into providing personal information.
- 4. Malware and Viruses: Downloading files or clicking on suspicious links can expose your device to malware and viruses.
- 5. Unsecure Networks: Using public or unsecure Wi-Fi networks can increase the risk of unauthorized access to your personal data.

User Precautions

To mitigate these risks, users are advised to:

- Use secure networks and avoid public Wi-Fi for sensitive transactions.
- Regularly update and use antivirus and anti-malware software.
- Be cautious of unsolicited emails or messages requesting personal information.
- Regularly change passwords and use strong, unique passwords for different accounts.
- Enable two-factor authentication where available.

Complaint Mechanism

If you have any concerns or complaints regarding our privacy practices or the handling of your personal data, Pinnacle Capital provides a structured complaint mechanism to address your issues:

1. Contact Us: Users can contact our Customer Support team through the following channels:

o Email: IR@pinnacle.sa

o Phone: +966112360097