1.0 Privacy Policy

This Privacy Policy explains how the Central Depository Company of Pakistan Limited (“CDC”) collects personal information about you and how it maintains, uses and discloses that information. It also provides some detail about the rights that customers have in respect of their personal information.

2.0 Personal Information

When you ask for information about CDC’s products and services or avail such products or services or access and use this and other CDC website(s) or submit an application to open an account with CDC, you will be providing CDC and its authorized personnel with your personal information. The authorized personnel who have access to the data have been trained to maintain the confidentiality of such information.

Personal information related to customers, including business representatives, agents, employees, administrators, and users of our services that may be collected by us include, but is not limited to:

- First and Last Name;
- Job Title;
- Organization or Department;
- Business Address;
- Telephone or Fax Number;
- Email Address; and
- Other information voluntarily provided to us.

CDC will also maintain records of all transactions and activities on accounts you have with CDC. During the course of your relationship with CDC, we will also gather information about products and services provided to you.

When assessing your application, CDC may also collect information about you from publicly available sources such as company registers.

Collection of such information may be required to enable us to provide services to our customers. Other information may be required to enable us to verify the identity or authority of customer, or its representatives, agents, employees, administrators, and users or for “Know Your Customer” purposes, where applicable.

Your personal information will be treated strictly in accordance with this Privacy Policy and will be retained only for as long as necessary to fulfil the purposes for which the information was collected, or as required by law.
A customer may at any time, upon request, gain access to the information that CDC holds about him or her in accordance with the Privacy Principles as described below.

3.0 Telephone Conversations

CDC may also record telephone conversations between you and persons working for CDC. Such recordings, or transcripts from such recordings, may be used to resolve any dispute between you and CDC.

Recordings or transcripts made by CDC of your telephone conversations may be destroyed under CDC's normal practice, which is to destroy them usually, but not necessarily, two calendar months after the date of the conversation.

4.0 CDC's Websites

CDC will also collect and hold information about you, when and if you complete an online application or other type of form, or access your account through our websites.

We also collect statistical information about visitors to our websites such as the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded. This information is used to evaluate and improve the performance of our websites. Other than statistical information, we do not collect any information about you through our website unless you provide the information to us.

You should also be aware that we use cookies on our websites. A cookie is a small amount of data, which often includes a unique identification number or value that is sent to your browser from a website's computer and stored on your computer's hard drive. Each website can send its own cookies to your browser if your browser allows it. However, to protect your privacy, your browser only allows a website to access the cookies it has sent to your computer.

When cookies are used on our websites, they are used to collect the statistical information referred to above, in addition to allowing you to access your account on-line. When you access your account on-line a cookie will be created which uniquely identifies your computer and your username and password. This means that you do not have to re-enter those details each time you want to access your account on-line.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. If you reject all cookies, you will be unable to access your account on-line. You can also delete cookies from your computer after they have been created.
5.0 Phishing Message

Phishing is a technique to obtain personal information about users etc., their passwords and or other details for malicious reasons.

Please note: If you have received an email from any domain other than @cdcpakistan.com directing you in any way to disclose your username or password kindly ignore the same and do not reply or comply with any instructions that may be contained in that email. You can also use Anti Phishing software which is provided in all new browsers. Furthermore, if you have already provided any information in response to such email you shall immediately contact CDCPL call center on 0800-CDCPL (23275) or 111-111-500 and inform accordingly.

Your prompt action can assist us to minimize the impact to other market users of CDC in any related scam activity being undertaken in our name.

6.0 Protection against Viruses

You must take all reasonably feasible measures to ensure that any computer or other device from which you access the cdcpakistan.com is free of any computer virus or similar device or software including, without limitation, devices commonly known as software bombs, Trojan horses and worms (together "Viruses") and is adequately maintained in every way. The cdcpakistan.com can be accessed through the Internet or other communication channels as the case may be, public systems over which we have no control. You must therefore ensure that any computer or other device you use to access the cdcpakistan.com is adequately protected against acquiring Viruses.

7.0 Use of Personal Information by CDC

The information requested in any application to open an account completed by our customers is required to enable CDC to make a decision about whether it will accept your application. CDC also requires the information to manage and administer the products and services provided to you. That information, together with the information collected and maintained by CDC during the course of our relationship with you, is required to keep you updated whilst you are a Customer.

We may use your personal information to contact you and deliver administrative notices or communications applicable to your use of CDC’s website and to provide the services you request. The information requested by us when you are accessing CDC websites is to allow us to provide you with information regarding the products and services offered by CDC.

We may also be required to provide your personal information to the Securities & Exchange Commission of Pakistan and other regulatory and governmental bodies from time to time in Pakistan under the law.
Subject to the provisions, allowances and limitations placed under the CDC Act, 1997 and CDC Regulations, CDC may also disclose your personal information to:

- any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant; or
- as may be allowed under the provisions of the CDC Act, 1997

CDC may use your personal information for:

- Marketing CDC products and services to you; and
- Developing an understanding of the products and services that you may be interested in obtaining from CDC.

We use commercially reasonable means to protect the integrity of CDC’s websites and to limit access to the personal information of our customers and to protect it from misuse, loss, unauthorized access or modification. However, we cannot provide absolute assurances against, and will not be liable for, any breaches of data security or confidentiality due to system failures or unauthorized access by third parties, or other causes beyond our reasonable control.

**8.0 What are your rights?**

You need not give us any of the personal information requested by CDC. However, without that information CDC will not be able to open an account for you where the information is requested in an application form, or to provide you with any other services, information or assistance you have sought.

Should you have any questions or complaint about your privacy please contact us at info@cdcpak.com. If a complaint is not resolved by CDC to your satisfaction, you may complain to the Privacy Commissioner.

**9.0 Correction of Information**

You are required to promptly notify us of any changes to the personal information that CDC holds about you. This ensures that your personal information is up to date and enables us to keep you informed of the continuing circumstances of your account, your margin obligations and your trading activities.

You may ask us at any time to correct personal information held by CDC about you, and which you believe is inaccurate. Should we disagree with you as to the accuracy of the information, you
may request that we attach a statement to that information noting that you consider it inaccurate or incomplete.

10.0 CDC acting as a Common Carrier Website

Users of this website should be aware that on all websites where CDC is acting as a common carrier, CDC does not control the content of the messages on such websites, does not verify the correctness, accuracy or validity of the information appearing on the sites, and is not responsible or liable whatsoever for the contents of any messages appearing on such website.

11.0 Other Websites, Applications or Online Services

We may provide links to websites, applications, or online services that are not operated by us. We are not responsible for the privacy practices of any websites, apps, or online services that we do not provide or operate. We recommend reviewing the privacy notices or policies of these third party websites, apps, or online services in order to understand their information practices.

12.0 No Warranties

While every care has been taken in preparing the information and materials contained in this site, such information and materials are provided to you “as is” without warranty of any kind either express or implied. In particular, no warranty regarding non-infringement, security, accuracy, fitness for a particular purpose or freedom from computer virus is given in conjunction with such information and materials.

13.0 Your Consent

By accessing this website, you consent to CDC collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

14.0 Amendments to this Privacy Policy

CDC reserves the right to make changes to this Privacy Policy from time to time for any reason. This document was current as at June 1st, 2018. You are required periodically to review our Privacy Policy, so that you are informed about the most current of our policies.

15.0 Report Information Security Incident

If you find any security incident, breach or other errors in the website, please inform us at: SIRT@cdcpak.com