Privacy Policy

Hughes Private Holdings

Effective date: 01 October 2026

Last updated:

1. About this Privacy Policy

Hughes Private Holdings ("HPH", "we", "us" or "our") respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how we collect, use, disclose, store and protect personal data when you visit Hughes Private Holdings, contact us, make an enquiry, request or receive our services, attend one of our events, subscribe to communications, or otherwise interact with us.

It also explains the rights that may be available to you under applicable data protection and privacy laws.

This website and our services may be accessed internationally. We apply the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, security and accountability. Where a local law gives you additional or different rights, we will comply with that law where it applies to our processing of your personal data.

This Privacy Policy does not form part of any contract and may be supplemented by more specific privacy notices where appropriate.

2. Who We Are

The organisation responsible for deciding how and why your personal data is processed is:

Legal entity: Hughes Private Holdings L.L.C-FZ

Trading name: Hughes Private Holdings

Registered office: Meydan Grandstand, 6th floor, Meydan Road, Nad Al

Sheba, Dubai, U.A.E.

Privacy contact: Hannah Logue - Risk And Compliance Administrator

Email: Hannah@hughesprivateholdings.com

For the purposes of applicable data protection law, HPH will usually act as the controller of the personal data described in this Privacy Policy. In limited circumstances, we may process information on behalf of another organisation, in which case that organisation's privacy notice may also apply.

3. Scope

This Privacy Policy applies to personal data relating to:

- website visitors;
- prospective, current and former clients;
- authorised representatives, family members, beneficiaries, trustees, directors, shareholders and other persons connected with a client;
- professional advisers, introducers, providers, suppliers and business contacts;
- event attendees and people who receive our communications; and
- individuals who contact us or interact with our online services.

Our services are not directed at children. We do not knowingly collect personal data directly from children through our website. Where information about a child is required in connection with a legitimate client relationship, we will process it only where permitted by law and with appropriate safeguards.

4. Personal Data We Collect

Depending on how you interact with us, we may collect the following categories of personal data:

4.1 Identity and contact information

This may include your name, title, date and place of birth, nationality, residential address, correspondence address, email address, telephone number, signature, photograph and identification numbers.

4.2 Identity verification and compliance information

This may include copies and details of passports, national identity cards, visas, driving licences, proof of address, tax identification numbers, tax residency, source of wealth, source of funds, bank statements, payslips, corporate ownership and control information, sanctions and politically exposed

person screening results, adverse media information and other records required for client due diligence, fraud prevention, sanctions compliance or anti-money laundering purposes.

4.3 Financial and professional information

This may include bank account details, income, assets, liabilities, investments, pensions, insurance arrangements, property interests, financial objectives, risk profile, capacity for loss, employment, occupation and professional or business information.

4.4 Service and relationship information

This may include enquiries, applications, agreements, instructions, authorities, meeting notes, correspondence, call records, complaints, client preferences, advice or service records, transaction and portfolio information, and information concerning your relationship with product providers, platforms or professional advisers.

4.5 Special-category and sensitive information

Where relevant and lawful, we may process information concerning health, vulnerability, disability, racial or ethnic origin, religious or philosophical beliefs, biometric identifiers used for identification, or other information treated as sensitive under applicable law. We will only process this information where we have an appropriate legal basis and any additional condition required by law.

4.6 Technical and website information

This may include your internet protocol address, device identifiers, browser type and version, time-zone setting, operating system, approximate location, pages viewed, links selected, referral source, login data and information collected through cookies or similar technologies.

4.7 Communications and marketing information

This may include your communication preferences, event registrations, survey responses and records of your engagement with emails or other communications.

We do not intentionally collect more information than is reasonably necessary for the relevant purpose.

5. How We Collect Personal Data

We may collect personal data:

- directly from you, including through website forms, email, telephone, video calls, meetings, applications, agreements, questionnaires and documents you provide;
- from a person authorised to act for you or from another person connected with you;
- from introducers, professional advisers, employers, trustees, companies or other business contacts;
- from financial institutions, investment platforms, product providers, insurers, property professionals and other service providers;
- from identity-verification, fraud-prevention, sanctions, politically exposed person and adverse-media screening providers;
- from public sources, including corporate registers, professional registers, government databases, court records, sanctions lists and publicly available online sources; and
- automatically when you use our website, through cookies, server logs and similar technologies.

If you provide personal data about another person, you should ensure that you are authorised to do so and, where appropriate, make this Privacy Policy available to them.

6. How and Why We Use Personal Data

We may process personal data for the following purposes and on the following legal grounds, where recognised by applicable law:

Purpose	Typical legal basis
Responding to enquiries and taking steps requested before entering into an agreement	Steps before entering into a contract; legitimate interests
Assessing, onboarding and servicing clients	Performance of a contract; legitimate interests
Verifying identity and completing due diligence, sanctions, fraud and anti-money laundering checks	Legal obligation; substantial public interest where applicable; legitimate interests

Understanding a client's circumstances, objectives, risk profile and service requirements	Performance of a contract; legal obligation; legitimate interests; explicit consent where required for sensitive data
Arranging, administering or reviewing services, products, investments, insurance or property-related matters	Performance of a contract; legitimate interests; legal obligation
Communicating with clients, representatives, providers and advisers	Performance of a contract; legitimate interests
Maintaining records, quality controls, audit trails and evidence of instructions	Legal obligation; legitimate interests; establishment, exercise or defence of legal claims
Managing complaints, disputes, investigations and regulatory enquiries	Legal obligation; legitimate interests; establishment, exercise or defence of legal claims
Protecting our systems, website, personnel, clients and business against security threats, misuse and fraud	Legal obligation; legitimate interests
Operating, monitoring and improving our website and services	Legitimate interests; consent where required for non-essential cookies or similar technologies
Managing suppliers, professional advisers and business relationships	Contract; legitimate interests
Sending service communications	Performance of a contract; legitimate interests
Sending marketing communications	Consent where required; otherwise legitimate interests where permitted by law

Meeting tax, accounting, company, financial-crime, regulatory and other legal requirements	Legal obligation; legitimate interests
Business administration, restructuring, due diligence or a sale or transfer of all or part of our business	Legitimate interests; legal obligation

Where we rely on legitimate interests, we consider whether our interests are proportionate and whether your rights and interests require additional protection.

Where consent is the legal basis, you may withdraw it at any time. Withdrawal will not affect the lawfulness of processing that occurred before consent was withdrawn.

7. If You Do Not Provide Personal Data

Where we need personal data to comply with law, conduct due diligence, enter into an agreement or provide a requested service, failure to provide the required information may prevent us from beginning or continuing the relationship. We will explain the consequences where appropriate.

8. Automated Decision-Making

We do not currently make decisions producing legal or similarly significant effects about individuals solely by automated means. We may use screening or risk-management tools to support human review. If this changes, we will provide any notice and safeguards required by applicable law.

9. Disclosure of Personal Data

Where reasonably necessary and lawful, we may disclose personal data to:

- group companies or affiliated businesses;
- financial advisers, investment platforms, product providers, banks, custodians, insurers and property or other service providers involved in delivering requested services;
- identity-verification, sanctions, politically exposed person, adverse-media, fraud-prevention and anti-money laundering providers;

- Lovable Labs Sweden AB and/or Lovable Labs Incorporated, which provide website development, hosting and related technology services, together with our other information-technology, cloud-hosting, communications, customer-management, document-management and cybersecurity providers;
- CreateME – provides website hosting and related website services. Personal data submitted through the HPH website, including contact form information, may be processed and stored on HPH's behalf using UK-based data centre infrastructure.
- accountants, auditors, lawyers, consultants and other professional advisers;
- regulators, supervisory authorities, tax authorities, law-enforcement agencies, courts and other public bodies where required or permitted by law;
- a prospective buyer, seller, investor or adviser in connection with a business transaction or restructuring; and
- other persons where you have authorised the disclosure or where it is otherwise lawful.

We require service providers processing personal data for us to protect it, maintain confidentiality and use it only for authorised purposes.

10. International Transfers

Because we operate and work with clients, providers and professional advisers internationally, personal data may be transferred to, accessed from or stored in countries outside your country of residence. Our website hosting provider, CreateME, processes and stores data submitted through our website using data centre infrastructure located in the United Kingdom. Our website technology provider, Lovable, has its main establishment in Sweden and may process personal data in the United States and other countries through its infrastructure and service providers.

Where applicable law restricts international transfers, we will use an approved transfer mechanism or another lawful safeguard. Depending on the relevant jurisdiction, these safeguards may include an adequacy decision, standard contractual clauses, the UK International Data Transfer Agreement or Addendum, binding corporate rules, contractual protections, regulatory consent, or an applicable legal exception.

We will also assess transfer risks and apply supplementary technical, organisational or contractual measures where appropriate. You may contact us for further information about the safeguards relevant to your data, subject to confidentiality and legal restrictions.

11. Data Security

We use proportionate technical and organisational measures designed to protect personal data against unauthorised access, unlawful use, accidental loss, alteration, destruction or disclosure. Measures may include access controls, multifactor authentication, encryption where appropriate, secure systems, staff training, supplier controls, backups, monitoring and incident-response procedures.

No internet transmission or information-storage system can be guaranteed to be completely secure. If a personal-data breach occurs, we will investigate and notify affected individuals and competent authorities where required by law.

12. Data Retention

We retain personal data only for as long as reasonably necessary for the purpose for which it was collected, including to satisfy legal, regulatory, tax, accounting, insurance, audit and reporting requirements, and to establish, exercise or defend legal claims.

Retention periods depend on the nature of the information, our relationship with you, the sensitivity of the information, applicable limitation periods and legal or regulatory requirements. Client due-diligence and service records may need to be retained for a number of years after the relationship ends.

When personal data is no longer required, we will securely delete or anonymise it, unless continued retention is required or permitted by law. Further information about relevant retention periods may be requested using the contact details in section 2.

13. Your Privacy Rights

Depending on your location and the law applying to our processing, you may have some or all of the following rights:

- to be informed about how your personal data is used;
- to request access to your personal data;
- to request correction of inaccurate or incomplete personal data;
- to request deletion of personal data;
- to request restriction of processing;

- to object to processing, including certain processing based on legitimate interests and direct marketing;
- to request transfer of data you provided in a structured, commonly used and machine-readable format;
- to withdraw consent at any time where processing is based on consent;
- not to be subject to certain decisions based solely on automated processing;
- to opt out of the sale or sharing of personal data, targeted advertising or certain profiling where applicable;
- to limit certain uses of sensitive personal data where applicable;
- to appeal a refusal of a privacy-rights request where applicable; and
- to complain to a competent data-protection or privacy authority.

These rights are not absolute. An exemption may apply, including where information must be retained to comply with law or protect legal rights.

To exercise a right, contact us using the details in section 2 and describe your request. We may ask for information reasonably necessary to verify your identity and authority. We will not discriminate against you for exercising a legal privacy right. We will respond within the period required by the applicable law and will normally not charge a fee, except where legally permitted.

An authorised agent may submit a request for you where permitted by law, but we may require evidence of that authority and may verify your identity directly.

14. Additional Information for UK and European Economic Area Individuals

Where the UK General Data Protection Regulation, UK Data Protection Act 2018 or European Union General Data Protection Regulation applies, the lawful bases described in section 6 apply to our processing.

You may complain to the supervisory authority in the country where you live or work or where you believe an infringement occurred. In the United Kingdom, the supervisory authority is the Information Commissioner's Office: **https://ico.org.uk/**.

If we are established outside the United Kingdom or European Economic Area but are legally required to appoint a representative, the representative's details will be stated here:

15. Additional Information for UAE Individuals

Where the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, or another applicable UAE privacy regime, applies, we will process personal data transparently and lawfully, apply appropriate security and confidentiality measures, respect applicable individual rights and use a lawful basis for cross-border transfers.

Certain UAE free zones and sectors have separate data-protection regimes. Where one of those regimes applies to our processing, we will comply with its specific requirements.

16. Third-Party Websites and Services

Our website may contain links to websites, platforms or services operated by third parties. We do not control those third parties and are not responsible for their privacy practices. You should review the privacy notice of each third-party service you use.

17. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in our activities, technology or legal obligations. The current version will be posted on our website with an updated revision date. Where a change materially affects how we use personal data, we will provide additional notice where required.

18. Contact Us

Questions, concerns and requests concerning this Privacy Policy or our use of personal data should be sent to:

Privacy contact: Hannah Logue - Risk And Compliance Administrator

Email: Hannah@hughesprivateholdings.com

Telephone: +971 55 871 2396

We would appreciate the opportunity to address your concern directly. You may also complain to the data-protection or privacy authority with jurisdiction over the matter.