

# **Data Processing and Privacy Policy**

## **SECTION 1. INTRODUCTION AND APPLICABILITY**

### **1.1 Purpose and Scope**

1.1.1 This **Data Processing and Privacy Policy** supplements and forms part of the Service Usage Policy governing your access to and use of the Company's Platform and Services.

1.1.2 The Company recognizes the importance of protecting personal information and is committed to processing such information in a lawful, transparent, secure, and responsible manner.

1.1.3 This Policy describes how the Company collects, uses, stores, discloses, transfers, protects, and otherwise processes personal information obtained through the Platform, Services, websites, applications, communication channels, and related systems.

1.1.4 By accessing or using the Services, creating an Account, or otherwise providing information to the Company, you acknowledge that your personal information may be processed in accordance with this Policy.

### **1.2 Definitions**

1.2.1 For the purposes of this Policy, "Personal Information" means any information that identifies, relates to, describes, or can reasonably be associated with an identifiable individual.

1.2.2 Personal Information may include both information provided directly by Users and information collected automatically through use of the Services.

## **SECTION 2. INFORMATION WE COLLECT**

### **2.1 Information Provided by Users**

2.1.1 The Company may collect information provided directly by Users, including:

- (a) full name;
- (b) residential address;
- (c) telephone number;
- (d) email address;
- (e) date of birth;
- (f) nationality;
- (g) government-issued identification details;
- (h) financial information; and
- (i) other information required to provide the Services.

### **2.2 Verification and Compliance Information**

2.2.1 In order to comply with legal, regulatory, risk management, fraud prevention, Know Your Customer (*KYC*), and Anti-Money Laundering (*AML*) obligations, the Company may request:

- (a) proof of identity;
- (b) proof of residence;
- (c) source of funds information;
- (d) source of wealth information;

- (e) financial suitability information; and
- (f) additional verification documents deemed reasonably necessary.

## **2.3 Automatically Collected Information**

2.3.1 The Company may automatically collect technical and usage information, including:

- (a) IP address;
- (b) browser type;
- (c) operating system;
- (d) device information;
- (e) login activity;
- (f) transaction history;
- (g) platform usage patterns; and
- (h) diagnostic information.

## **2.4 Cookies and Similar Technologies**

2.4.1 The Company may use cookies, web beacons, pixels, analytics tools, and similar technologies to improve functionality, personalize user experiences, maintain security, and analyze Platform usage.

2.4.2 Additional information regarding cookies may be provided through separate notices or settings available on the Platform.

# **SECTION 3. PURPOSES OF PROCESSING**

## **3.1 Operational Purposes**

3.1.1 Personal Information may be processed for purposes including:

- (a) account creation and administration;
- (b) provision of Services;
- (c) transaction processing;
- (d) customer support;
- (e) account security;
- (f) communications management; and
- (g) operational administration.

### **3.2 Compliance and Regulatory Purposes**

3.2.1 Personal Information may be processed to:

- (a) satisfy legal obligations;
- (b) comply with KYC and AML requirements;
- (c) conduct sanctions screening;
- (d) perform fraud prevention activities;
- (e) satisfy reporting obligations; and
- (f) cooperate with competent authorities.

### **3.3 Platform Improvement and Analytics**

3.3.1 Information may be used to improve Platform functionality, system performance, security controls, product development, operational efficiency, and user experience.

## **SECTION 4. LEGAL BASIS FOR PROCESSING**

### **4.1 Processing Grounds**

4.1.1 The Company may process Personal Information where such processing is necessary:

- (a) to provide the Services;
- (b) to comply with legal obligations;
- (c) to protect legitimate business interests;
- (d) to prevent fraud or financial crime;
- (e) to establish, exercise, or defend legal claims; or
- (f) where consent has been obtained when required.

## **SECTION 5. DISCLOSURE OF INFORMATION**

### **5.1 Service Providers and Business Partners**

5.1.1 Personal Information may be disclosed to third-party service providers who assist the Company in delivering its Services.

5.1.2 Such providers may include:

- (a) payment processors;
- (b) technology providers;
- (c) hosting providers;
- (d) compliance service providers;
- (e) identity verification providers;
- (f) analytics providers; and
- (g) professional advisers.

### **5.2 Regulatory and Legal Disclosures**

5.2.1 The Company may disclose Personal Information where required by law, regulation, court order, governmental request, regulatory inquiry, or other legally binding process.

### **5.3 Corporate Transactions**

5.3.1 Personal Information may be transferred as part of a merger, acquisition, restructuring, financing transaction, sale of assets, or similar corporate event.

## **SECTION 6. INTERNATIONAL DATA TRANSFERS**

### **6.1 Cross-Border Processing**

6.1.1 Personal Information may be processed, stored, or transferred across jurisdictions where the Company, its affiliates, or service providers operate.

6.1.2 Data protection laws in certain jurisdictions may differ from those applicable in your country of residence.

6.1.3 The Company shall take reasonable measures to implement appropriate safeguards for international transfers where required.

## **SECTION 7. DATA SECURITY**

### **7.1 Security Measures**

7.1.1 The Company maintains technical, administrative, and organizational safeguards designed to protect Personal Information against unauthorized access, misuse, alteration, disclosure, destruction, or loss.

7.1.2 Security measures may include:

- (a) encryption technologies;
- (b) secure communication protocols;
- (c) access controls;
- (d) network monitoring;
- (e) authentication mechanisms;
- (f) vulnerability assessments; and

(g) security testing procedures.

## **7.2 Account Security**

7.2.1 The Company may implement multi-factor authentication, account verification procedures, access restrictions, and other security measures designed to protect User Accounts.

7.2.2 Users remain responsible for maintaining the confidentiality of login credentials and authentication information.

## **7.3 Incident Response**

7.3.1 The Company maintains procedures designed to identify, investigate, contain, and respond to security incidents affecting Personal Information.

7.3.2 Where required by law, affected individuals and authorities may be notified of qualifying incidents.

# **SECTION 8. USER RIGHTS AND RESPONSIBILITIES**

## **8.1 User Rights**

8.1.1 Subject to applicable law, Users may have rights relating to their Personal Information, including:

- (a) access rights;
- (b) correction rights;
- (c) deletion rights;
- (d) restriction rights;
- (e) portability rights; and
- (f) objection rights.

8.1.2 Requests shall be evaluated in accordance with applicable legal and regulatory requirements.

## **8.2 Data Accuracy Obligations**

8.2.1 Users are responsible for ensuring that information provided to the Company remains accurate, complete, and current.

8.2.2 Users should promptly notify the Company of material changes to their Personal Information.

## **8.3 User Security Responsibilities**

8.3.1 Users must take reasonable steps to protect their devices, passwords, authentication methods, and account credentials.

8.3.2 The Company shall not be responsible for losses arising from a User's failure to maintain adequate security practices.

# **SECTION 9. MARKETING COMMUNICATIONS**

## **9.1 Communications**

9.1.1 The Company may send operational notices, service announcements, regulatory communications, account-related notifications, promotional materials, and marketing communications.

9.1.2 Users may opt out of marketing communications where permitted by law.

9.1.3 Operational, security, compliance, legal, and account-related communications may continue notwithstanding marketing preferences.

## **SECTION 10. DATA RETENTION AND DISPOSAL**

### **10.1 Retention Periods**

10.1.1 Personal Information shall be retained only for as long as necessary to satisfy legal, regulatory, operational, contractual, compliance, audit, dispute resolution, and business requirements.

### **10.2 Secure Disposal**

10.2.1 When Personal Information is no longer required, the Company may securely delete, anonymize, archive, or otherwise dispose of such information in accordance with applicable requirements.

## **SECTION 11. CHILDREN AND RESTRICTED USERS**

### **11.1 Age Restrictions**

11.1.1 The Services are not intended for individuals under eighteen (18) years of age or any higher minimum age required under applicable law.

11.1.2 If the Company becomes aware that Personal Information has been collected from a prohibited individual, appropriate measures may be taken to remove such information.

## **SECTION 12. COMPLIANCE OVERSIGHT AND POLICY ADMINISTRATION**

### **12.1 Monitoring and Auditing**

12.1.1 The Company may conduct reviews, audits, assessments, testing, and monitoring activities to evaluate compliance with this Policy and applicable data protection obligations.

### **12.2 Amendments**

12.2.1 The Company reserves the right to amend, revise, supplement, replace, or update this Policy at any time.

12.2.2 Amendments shall become effective upon publication through the Platform or other communication channels designated by the Company.

12.2.3 Continued use of the Services following publication of amendments constitutes acceptance of the updated Policy.

## **SECTION 13. CONTACT INFORMATION AND USER ACKNOWLEDGEMENT**

### **13.1 Contact Requests**

13.1.1 Questions, concerns, requests, or notices relating to privacy matters may be submitted through the communication channels designated by the Company.

### **13.2 Acceptance of Policy**

13.2.1 By accessing or using the Services, creating an Account, or submitting Personal Information to the Company, you acknowledge that you have read and understood this Data Processing and Privacy Policy.

13.2.2 You consent to the collection, use, disclosure, storage, transfer, and processing of Personal Information as described in this Policy and as otherwise permitted by applicable law.

