

# **PRIVACY POLICY**





**Updated:** *March, 21, 2025* 

# **Privacy Policy**

## **Respecting your privacy**

We value your personal information and are committed to protecting it. This Privacy Policy outlines how we handle your information and applies to the investment dealer.

In addition to the general handling of personal information, this Policy also includes our credit reporting policy. This section outlines how we manage credit-related information collected in connection with credit applications or facilities. We refer to this credit-related information as credit information.

Our collection and use of data will be in accordance with the Data Protection Act 2017, which governs the way we collect, use, hold, process, and disclose your personal information. As a data controller under this act, we are responsible for making decisions on how and why your personal information is processed.

## Personal Information that we collect and hold

The types of information that we collect and hold about you could include:

- 1. ID information such as your name, postal or email address, telephone numbers, and date of birth;
- 2. other contact details such as social media handles;
- 3. financial details such as your tax file number; and
- 4. other information we think is necessary.

As a regulated entity, we may collect information about our clients as required or authorized by regulations. There are specific laws that mandate us to collect personal information for various purposes. For instance, we need to collect personal information to verify your identity in compliance with the Financial Intelligence and Anti-Money Laundering Act 2002 (FIAMLA 2002).



#### **Collect Information Via Website**

As a valued customer using our website, products, and services, we monitor your usage to ensure the security of your account, communicate important updates, and find ways to improve your overall experience. If you begin an online application but do not submit it, we may contact you using the information you provided to offer assistance in completing the application. Any data included in incomplete applications will be stored temporarily and securely deleted if the application is not finalized.

We understand that some customers prefer to interact with us through social media platforms. If you engage with us on these channels, we may collect information about you. However, for any private or sensitive matters, we will communicate with you through a secure forum to ensure confidentiality.

To improve our services and products, we may collect de-identified information from individuals using our web services. This information may include IP addresses or geographical data to ensure the security of your use of our web applications.

## **USE YOUR DATA**

The Company places a high value on the privacy and security of its clients' Personal Data, and as such, it processes this information for several essential purposes.

- 1. process orders and transactions efficiently, clients' personal information, such as name, address, and payment details, is utilized;
- 2. the Company aims to provide exceptional customer support by using clients' contact information to promptly address any questions or concerns they may have;
- 3. the Company conducts market research by analyzing usage data, such as website activity and purchase history, to understand trends and preferences better;
- 4. the Company also employs their contact information to send marketing communications, such as promotional emails and newsletters, ensuring that clients are informed of relevant offers and updates;



- the Company strives to enhance the user experience by personalizing content and providing relevant recommendations based on clients' usage data. This approach ensures that each client receives a customized and engaging experience while interacting with the Company's services;
- 6. to protect both the Company and its clients, Personal Data, including personal and usage data, is utilized to monitor and prevent fraudulent activities and potential security breaches.

The Company may occasionally request the Customer to provide Personal Data in order to fulfill legal requirements or to establish an agreement between the Customer and the Company. In such instances, the Company will be transparent and inform the Customer about the specific purpose of collecting their Personal Data.

# **COOKIES POLICY**

We use cookies and similar technologies on our website to enhance your experience, analyze how you use our site, and improve our services' quality. Cookies are small data files sent to your browser from a web server and stored on your device. You have the option to configure your browser to accept or reject cookies or receive notifications when a cookie is sent. However, disabling cookies may impact some features of our website, affecting their proper functioning.

We utilize various types of cookies for different purposes on our website:

- 1. Essential cookies: These are crucial for core functionality, such as secure access, shopping cart management, and login status.
- 2. Analytical cookies: They help us gather data on website usage, like popular pages and viewed products, to optimize the website and enhance user experience.
- 3. Performance cookies: These track website performance metrics, like page load times, to identify and resolve issues for improved overall performance.
- 4. Advertising cookies: They deliver relevant ads based on your interests and may control ad frequency or measure campaign effectiveness.



In addition to our own cookies, we may use third-party cookies from other domains. These could be for analytics to understand how visitors use our website or for personalized ads served by third-party advertisers. By using our website, you agree to the use of cookies as described in this policy. You can manage cookie preferences in your browser settings or opt out of targeted advertising through the provided opt-out links. Opting out of advertising cookies won't stop ads but will make them less personalized.

## **CUSTOMER RIGHT ON THEIR DATA**

Under the Data Protection Act 2017, the Company governs the collection, use, and disclosure of personal data of individuals accessing its website. This ensures the privacy of individuals and their personal information, including their name, address, phone number, email, and other details. The Act sets rules for obtaining consent, limiting data use to specific purposes, and ensuring data accuracy and security. It aims to protect individuals' personal data and ensure responsible data handling practices.

As our valued customer, you have certain rights regarding your personal data under applicable data protection laws. These rights include:

- 1. Right of access: You have the right to request access to the personal data we hold about you and receive a copy of it.
- 2. Right to rectification: If your personal data is inaccurate or incomplete, you have the right to request corrections or updates.
- 3. Right to erasure: You can request the deletion of your personal data under certain circumstances, like when it's no longer necessary or when you withdraw consent.
- 4. Right to restrict processing: You have the right to request restrictions on the processing of your personal data under specific situations.
- 5. Right to data portability: You can request a copy of your personal data in a machine-readable format and transmit it to another data controller.

To exercise these rights, please reach out to us using the contact information provided in this policy. For security purposes, we may need to verify your identity before responding to your request. Keep in mind that there are situations where we may not be able to fulfill



your request, such as legal obligations or contractual requirements. If any such circumstances apply, we will inform you accordingly when you make the request.

# PERSONAL DATA SHARING

The Company takes the privacy of your personal data seriously and may share it with third parties to provide you with our services. These third parties include:

- 1. Financial institutions: We may share your personal data with banks and other financial institutions to facilitate fund transfers between you and your designated recipient, including your name, contact information, and transaction details.
- 2. Payment processors: We may share your personal data with payment processors to process your payment transactions, including your name, billing address, payment information, and transaction details.
- 3. Compliance and regulatory authorities: We may be required by law to share your personal data with authorities to ensure compliance with applicable laws and regulations, such as tax authorities or anti-money laundering agencies.
- 4. Service providers: We may share your personal data with service providers who assist us in customer support, fraud prevention, IT services, etc. These providers are contractually bound to use your data only for the specific purposes and maintain its confidentiality and security.
- 5. Credit reporting agencies: We may share your personal data with credit reporting agencies to obtain credit reports and assess your creditworthiness, including your name, address, date of birth, and social security number.
- 6. Affiliates: We may share your personal data with our affiliated companies for internal reporting and analysis.
- 7. Business transactions: Your personal data may be shared in connection with a merger, acquisition, or asset sale, and we will notify you before any data transfer to a different privacy policy.
- 8. With your consent: We may share your personal data with third parties for purposes not described in this privacy policy, but only with your explicit consent, which you can withdraw at any time.

Please be aware that in certain circumstances, we may be obligated to share your personal data with third parties without seeking your consent, as required by law or in



response to a court order or subpoena. However, rest assured that we will take all necessary precautions to safeguard your privacy to the best of our abilities. If you have any queries or apprehensions about our personal data sharing practices, please feel free to reach out to us using the contact information provided in this policy.

At our company, we prioritize the protection of your personal data. When sharing your information with third parties, we ensure that they are obligated to maintain confidentiality and adhere to stringent security measures. Your data is utilized solely for the intended purposes for which it was shared, and we never engage in selling or renting your personal information to third parties.