

Broctagon Fintech Group (“the Company”)

PRIVACY POLICY Last Updated on Dec 2023

1. OUR COMMITMENT TO YOU

The Company values the confidentiality and privacy of your information. By entrusting us with your data, we commit to keeping it secure and private. By entrusting us with your information, we assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security, and integrity of your information.

This Privacy Policy provides an overview of how Broctagon Fintech Group (the “Company”) processes your personal data. By accessing our website or using our communication channels, you acknowledge and accept the terms of this Privacy Policy. This Policy, including any updates, governs how we collect, store, use, share, and process your personal data, as well as your rights during and after our relationship.

This Privacy Policy supersedes any information regarding the processing of personal data that is included in any of the existing Agreements/Client Agreement and associated forms on matters covered by this Privacy Policy. The Company may revise or update this policy from time to time, with the new version available on our website.

For the purposes of this statement:

- (a) Personal Data shall mean any operation or set of operations which is performed on personal data or on sets of personal data.
- (b) Controller shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- (c) Processor shall mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

2. COLLECTION OF INFORMATION

The information we collect may include, but is not limited to:

- (a) Personal details such as name, surname, address, telephone number, tax residence, tax identification number email address;
- (b) Identity verification documents such as passport, Identity cards, utility bills, bank statements, bank account details, corporate documents of your Company
- (c) Information regarding your use of our website, including pages visited, frequency, duration of visit, and trading activities.

- (d) Other information obtained during our KYC (Know Your Customer) procedures, such as details about your financial status and sources of funds.

Further to the above, the Company may also request further information to improve its Service to you (Existing or Potential Clients) under our relevant Agreement, as the case may be, or comply with Applicable Regulations.

The Company records any communications, electronic, by telephone, in person or otherwise, that the Company has with you in relation to the services that were provided by the Company to you and the relationship with you. The said recordings will be the Company's sole property and will constitute evidence of the communications between the Company and you.

3. CONTACTING YOU

The Company may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or post.

If you agree, the Company or any of our Affiliates of the Company may make contact with you from time to time, by telephone, fax, email or post for marketing purposes to bring to your attention products or services that may be of interest to you or to conduct market research.

4. DISCLOSURE OF INFORMATION

As part of using your personal information for the purposes set put above, we may disclose your information to:

- Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services.
- Partners or Tied Agents with whom the Company has close relationships and who are exclusively working for the Company.
- Regulatory Authorities.
- Anyone authorized by you.
- Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
- The Company's employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform.

We require external organizations handling personal information to respect confidentiality, comply with data protection laws, and follow this privacy policy.

5. USE OF INFORMATION

The Company will use, store, process, and handle your personal data in accordance with applicable data protection laws. Your personal data will be collected and processed explicitly and specifically for the purposes for which they have been collected. The Company may use your personal information to:

- Fulfil our legal or regulatory requirements.
- Verify your identity in accordance with applicable legislation and our Anti Money Laundering policy and address other law enforcement needs. We may also share your information with other financial institutions and tax authorities if required by applicable legislation.
- Detect, investigate, and prevent fraudulent transactions or unauthorized or illegal activities.
- Protect our rights and property.
- Personalize your services experience.
- Analyse website usage and improve our website and offerings. This includes tracking data to determine the usefulness or popularity of certain content and better understand the online activity of our users.
- Help us respond to your customer service requests and support needs, answer your inquiries, or respond to communications from you.
- Contact you about services. We may use the email address you provide to communicate information and updates related to your use of the services. This may include technical notices, support or administrative notifications, company news, updates, promotions, and related information relating to similar products and services provided by us.
- Administer contests, promotions, surveys, or other features as explained on our website.
- Link, connect, or combine personal information the Company collect from or about you with other personal information.
- Carry out any other purpose or reason for which the information was collected.

The Company does not perform behavioural tracking of activities on our website or across different websites, nor does the Company allow third-party data collection through our services. If you wish to stop receiving marketing communications from us, please contact us at info@broctagon.com to opt-out.

6. YOUR CONSENT

The use of your personal information requires your consent, such consent will be provided in accordance with the Financial Services Agreement that it is provided to you during the account opening procedure. The Company shall rely on the provided consent as its legal basis for processing your personal data. You have the right at any time to withdraw that consent by contacting us via phone or via email at info@broctagon.com.

In certain circumstances the company can process your data without your consent, such as to comply with legal obligations or to perform a contract

7. MANAGEMENT OF YOUR PERSONAL INFORMATION AND SAFEGUARD MEASURES

The Company has implemented comprehensive measures to secure your personal data. Only employees and partners who need access to your information to maintain the agreement between you and the Company are granted access.

Your personal information is stored securely using a combination of protected computer storage, secure servers, and, when necessary, paper-based files. The Company has taken every step to protect your personal information from misuse, loss, unauthorized access, modification, or disclosure.

While we strive to safeguard your information, please acknowledge that internet use is not entirely secure. Therefore, we cannot guarantee the security or integrity of personal data transferred via the internet.

We will retain your personal data for the duration of our business relationship and for up to five (5) years after its conclusion, in compliance with applicable laws. In some cases, we may retain your data for longer to meet legal, regulatory, or other mandatory requirements. Retention periods are determined based on the type and purpose of the information collected, ensuring outdated or unused information is destroyed at the earliest reasonable time.

8. CHANGE OF INFORMATION

You may inform the Company at any time that Your Information has changed or that you wish the Company to delete information the Company hold about you by emailing us at info@broctagon.com. The Company will change or delete Your Information in accordance to your instructions, except to the extent that the Company are required to hold Your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

9. RIGHT OF ACCESS

You have the right to:

- Know what personal information we process and how we use it.
- Receive a copy of your personal information and request clarification on its use.
- Receive your personal information in a machine-readable format where applicable.
- Object to the processing of your personal information.
- Avoid automated decision-making, including profiling, unless necessary for a contract.
- Access, correct, update, and block inaccurate data.
- Withdraw your consent to personal information processing.
- Request the deletion of your personal information ("right to be forgotten").

To exercise these rights, contact us at info@broctagon.com, specifying your request and verifying your identity.

10. DATA PROTECTION OFFICER

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our website, you may email us at info@broctagon.com.

11. UPDATE OF THIS POLICY

This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.