

# PRIVACY POLICY

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## 1. INTRODUCTION

- 1.1. This Privacy Policy (the “Policy”) informs you how we look after your personal data when you visit our website (regardless of where you visit it from, or of the media on which that data is stored) and tells you about your privacy rights and how the law protects you. We will from time to time update this Policy as we undertake new personal data practices or adopt new privacy policies.
- 1.2. This website is operated by Axiory Global Ltd, owner of the Axiory trademark operating through Axiory Global Ltd, incorporated under the laws of Belize, under Reg. No. 000005723 (former Reg. No.127090) and having its registered office at No. 1 Corner of William Fonseca Street and Marine Parade, Belize City, Belize, and through Tradit Ltd, incorporated under the laws of the Republic of Mauritius under Registration No. 179444 and having its registered address at The Cyberati Lounge, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebène, Republic of Mauritius (hereinafter collectively referred to as “Axiory”). Through this website you may learn about the products and services we offer, register to become our client, access market news, and interact with tools or applications we provide. You will be able to learn access most parts of the website without registering your personal data with AXIORY. However, we use cookies and similar technologies which provide us with personal data about you. You can read more about our cookies and your choices in our Cookie Policy.
- 1.3. We are part of an international group of companies (“Affiliates”) and share administrative resources and systems. We may therefore share some or all of your personal data with our Affiliates with whom we may share administrative resources and systems. We may therefore share some or all of your personal data with our Affiliates for administrative purposes and for the legitimate purposes described in this Policy.
- 1.4. Our website may include links to our Affiliates websites, plug-ins and applications. Clicking on those links or enabling those connections may allow our Affiliates to collect data about you. When you enter our Affiliates’ websites, we encourage you to read such websites’ privacy policies.

## 2. PURPOSE

- 2.1. This Policy aims to give you information on how AXIORY collects and processes your personal data through your use of our website, including any data you may provide through the website when you register with us and/or purchase a product or service. Our website is not intended for children and we do not knowingly collect data relating to children.
- 2.2. This Policy supplements our Terms of Business and it is important that you read this Policy in conjunction with such terms.

## 3. THIRD-PARTY LINKS

- 3.1. In addition to having links to our Affiliates’ websites, our website may also include links to other third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow such third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy

statements. When you leave our website, we encourage you to read the privacy policy of every third-party website you visit.

#### 4. DATA WE COLLECT ABOUT YOU

- 4.1. We collect adequate and relevant personal data, limited to what is necessary in relation to the purposes for which it is processed.
- 4.2. Personal data, or personal information, means any information about an individual from which that person can be identified.
- 4.3. We may collect, store and transfer different kinds of personal data about you which we have grouped together as follows:
  - **Identity Data** includes first name, maiden name, last name, government identification number, username or similar identifier, marital status, title, date of birth and gender
  - **Contact Data** includes billing address, delivery address, email address and telephone numbers
  - **Financial Data** includes bank account and payment card details, source of funds or wealth
  - **Transaction Data** includes details about payments to and from you, your trading activity and any other details of products and services you have purchased from us
  - **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website
  - **Profile Data** includes your username and password, orders made by you and your feedback
  - **Usage Data** includes information about how you use our website, products and services
  - **Marketing and Communications Data** includes your preferences in receiving marketing from us, our Affiliates and our third parties, your communication preferences and records
- 4.4. We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. The aggregated data we may collect is not considered personal data as it will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific feature of our website. However, in the event we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat such combined data as personal data which will be used in accordance with this Policy.

#### 5. DATA REQUIRED BY LAW

- 5.1. Where we are required by regulations to collect personal data, or under our Terms of Business, and you fail to provide that data when requested, we may not be able to perform the agreement we have or are trying to enter into with you to provide you with our products and services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 6. USES MADE OF THE DATA

6.1. We use different methods to collect data from you and about you which will be used in the following ways:

- **Information you give us** will be used to
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit our Affiliates and selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;
  - to notify you about changes to our service;
  - to ensure that content from our website is presented in the most effective manner for you and your computer.
- **Information we collect about you** will be used
  - to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our website safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to share encrypted (hashed) versions of your personal data, such as your email address, with advertising platforms, including but not limited to, Meta (Facebook), Google, or TikTok, for the purpose of creating lookalike audiences. This allows us to identify and target potential clients with similar characteristics to our existing clients and to deliver relevant advertising about our products and services to new audiences;
  - to make suggestions and recommendation to you and other users of our website about goods or services that may interest you or them;
  - to protect our website, services and users from fraud, abuse and automated access, including through the use of security tools such as Google reCAPTCHA. This service analyses user behaviour (such as IP address, device and interaction data) to determine whether a user is human. Data may be processed by Google on our behalf in accordance with their Privacy Policy.

- **Information we receive from other sources** may be combined with information you give us and information we collect about you. We may use this information and the combined information for the purposes set out above, depending on the types of information we receive.

## 7. COOKIES

7.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

## 8. ACCESSING THE AXIORY MOBILE APPLICATION

8.1. The Axiory mobile application is available for download in the Apple App Store and Google Play store and is designed to work with Apple's Face ID and Touch ID and Android's Trusted Face and Fingerprint biometric authentication tools. Accessing the Axiory mobile application is possible if your mobile device supports biometric authentication tools and if the biometric authentication tools functionality is enabled and you confirm that you want to use such tools to sign into your Axiory mobile application.

8.2. Apple's Face ID and Touch ID and Android's Trusted Face and Fingerprint are authentication tools offered and governed by Apple and Android mobile devices, respectively. We have no control over your biometric authentication data that may be retained by the aforementioned biometric authentication tools. We are not responsible for any issues arising out of your decision to use such authentication tools to access your Axiory mobile application, and we shall not be liable for any unauthorised access to or unauthorised use of your biometric data or other data that is caused by your use of the said biometric authentication tools.

## 9. DISCLOSURE OF THE DATA

9.1. We may share your information with any of our Affiliates, which means our ultimate holding company and its subsidiaries. We may also share your information with selected third parties such as:

- Business partners, service providers and contractors for the performance of any contract we enter into with you
- Advertisers and advertising networks that require that data to select and service relevant adverts to you, which may involve sharing your personal data, including encrypted (hashed) versions of your contact information, with advertising platforms, including but not limited to, Meta (Facebook), Google, or TikTok, as well as security service providers such as Google reCAPTCHA, for the purpose of creating lookalike audiences to identify and target potential clients with similar characteristics to our existing clients
- Review and feedback platforms (such as Trustpilot), to enable us to invite clients to provide feedback on our services
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.

- 9.2. We may also disclose your personal information if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our Terms of Business, or to protect our rights, property, our clients or others. This includes exchanging information with other organisations for the purposes of fraud protection.

## 10. STORAGE OF THE DATA

- 10.1. The data we collect from you may be transferred to, and stored within and outside the EEA, and may be processed by our staff or our Affiliates' staff which may be engaged in, among other things, with the approval of your account, fulfillment of your orders, the processing of your payment details and the provision of compliance and support services. By submitting your personal data, you agree to the transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.
- 10.2. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 10.3. We may transfer your personal data, in encrypted (hashed) form, to advertising platforms located outside your country of residence for the purpose of creating lookalike audiences and targeting advertising. We assure that appropriate safeguards are in place to protect your data, and you may contact us if you wish to learn more about these safeguards.

## 11. DATA SECURITY

- 11.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 11.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 12. DATA RETENTION

- 12.1. We are required by regulation to keep information about our clients, including Identity, Financial, Transaction Data for up to 7 years after you cease being our clients.
- 12.2. In some circumstances you can ask us to delete your data. See your Legal Rights below for further details.

12.3. In some circumstances we will anonymise your personal data so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### 13. YOUR LEGAL RIGHTS

13.1. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you before collecting your data if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

13.2. You have the right to prevent such processing by checking certain boxes on the forms we use to collect your data or by contacting us.

13.3. You have the right to request access, correction, and transfer of your personal data. At any time, you have the right to object to the processing of your data and to withdraw your consent to its processing.

13.4. Your right to access your data will not bear a fee (or to exercise any other rights), however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

13.5. You have the right to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal and/or regulatory reasons which will be notified to you, if applicable, at the time of your request.

### 14. CONTACT DETAILS

14.1. If you have any questions about this Policy or our privacy practices, please contact us in the ways available on this link: <https://www.axiory.com/contact>