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License no. GB24202825

ICM Brokers Ltd

Privacy Policy

Version 1.0

1. Our Commitment to You

ICM Brokers Ltd is an Investment Dealer (Full-Service Dealer, excluding Underwriting), regulated by the **Financial Services Commission ('FSC') in Mauritius** under the license number **GB24202825** (hereinafter referred to as "ICM Brokers" or the "**Company**").

We understand the importance of maintaining the confidentiality and privacy of personal information that we hold about our clients and other third parties. This Privacy Policy Statement (hereinafter 'this Statement') outlines how we manage and protect the personal information you give us and hold about our clients. By visiting our website and using our services, your agreement to this Policy is implied. We are bound by the Mauritius Data Protection Act 2017. Mauritian Data Protection Act 2017, sets out the rules for information matching and provides on how the personal information is treated. These principles reflect internationally accepted standards for personal information handling.

This Policy applies to any processing by us of personal data of all our natural stakeholders, including but not limited to our employees, suppliers, creditors, clients, customers, job applicants, shareholders, investors and web users hereinafter referred to as "**data subjects**" or "**you**". This Policy will be reviewed periodically to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. You should check this page from time to time to ensure that you are happy with any changes. Any information held will be governed by our most current Policy.

This Privacy Policy supplements the other policies and is not intended to override them.

2. Collection and processing of personal information

When we collect, store and use your personal information, we do so in accordance with the rules set down in the Mauritius Data Protection Act 2017. We are committed to being open and transparent about how we use your personal information.

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website, including information provided when registering to open an Account, using our website, subscribing to our services or posting material;
- If you contact us or respond to surveys, we may keep a record of that correspondence;
- Details of any orders or transactions (historic or otherwise) that you have carried out through our website; Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access;
- Information about your computer, including IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers.

It is important that the personal data we hold about you is accurate and current. Please keep us informed, if your personal data changes during your relationship with us.

Except for certain information that is required by law, your decision to provide any personal data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal data, or you fail to provide that data when requested. However, please note that if you do not provide certain information, we may not be able to

accomplish some or all of the purposes outlined in this Privacy Policy, in particular, we or you may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

We will **not** use your personal data for purposes that are incompatible with the purposes for which they were collected, and of which you have been informed, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

We may process your personal data without your knowledge or consent, where this is required or permitted by law. For example, in order to prevent fraud and other illegal activity, and for verification process of any payment transaction or online payment.

We take cautionary measures to ensure we do not collect any personal data from you which we do not need in order to provide our products and services to you.

3. For how long do we store your personal data

We only retain your personal data for as long as necessary to fulfil the purposes for which they were collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your information we use for marketing purposes will be kept with us until you unsubscribe or notify us that you no longer wish to receive our marketing offers or emails and request to destroy your personal information.

4. How we use cookies

A cookie is a piece of data stored on the user's computer tied to information about the user. Usage of a cookie alone is in no way linked to any personally identifiable information while on our website. We use both session ID cookies and persistent cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. A persistent cookie is a small text file stored on the user's hard drive for an extended period of time. Persistent cookies can be removed by following Internet browser help file instructions.

When you use our website, we will use cookies to distinguish you from other users of our website. This helps us to provide you with a more relevant and effective experience when you browse our website, including presenting websites according to your needs or preferences and allows us to improve the site generally.

5. How we use the information

We use information held about you in the following ways:

- to ensure that the content in our website is presented to you in the most effective manner;
- to provide you with products and services that you request from us or, where you have consented to be contacted, for products and services that we feel may be of interest to you;
- managing and administering the products and services provided to you;
- keeping you updated as a client in relation to changes to our services and relevant matters;
- to carry out our obligations arising from any contracts entered into between you and us.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by email.

6. Who we disclose the information to?

Depending on the products and services concerned and the relevant restrictions on sensitive data, personal information may be disclosed to:

- Our employees on a need-to-know basis;
- Potential successors in title to our business;
- third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
- any organization or person acting on your behalf to whom you request us to provide information, including your financial advisor, broker, solicitor or accountant;
- third parties where it is necessary to process a transaction or provide services you have requested;
- to a Trade Repository or similar;
- Banks (where they request additional information following payments that you have made);
- credit providers, courts, tribunals and regulatory authorities in response to legal and regulatory requests or other government agencies, as agreed or authorized by law;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, in any jurisdiction where we operate;
- at your request or with your consent.

7. The steps we take to protect your personal data

We maintain organizational, physical and technical security measures

- (i) to prevent your personal data from unauthorized access, alteration, disclosure, accidental loss, and destruction, and
- (ii) based on the nature of the personal data, to protect your personal data from the harm that may result in unauthorized access, alteration, disclosure, destruction of the data

and its accidental loss.

8. Rights in relation to your personal information

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. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting through an email on our website.

You also have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. To make a request, please write to us, verifying your identity and specifying what information you require. We may charge an administrative fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

8.1. Legal bases for processing (for European Economic Area users)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so, under applicable European Union laws. The legal bases depend on the services you use and how you use them.

This means we collect and use your information only where:

- we need it to provide you with our services, provide customer support and personalized features and to protect the safety and security of our services;
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose; or
- we need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g., your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services.

9. Safeguard Measures

We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

We limit access of information only to those relevant employees or partners that need to know

the information in order to enable the carrying out of the Agreement between us. We do not hold or store Credit/Debit card data. We have procedures in place regarding how to safeguard and use your information, for example, by requesting our Affiliates and employees to maintain the confidentiality of your information.

We will not keep your personal information for any longer than is required. In many cases, information must be kept for considerable periods of time. However, when we consider that information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

While we will use all reasonable efforts to safeguard our clients' personal information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

10. Your consent

By submitting any personal information (including, without limitation, your account details) to us you consent to the use of information as set out in this Policy. We reserve the right to amend or modify this Privacy Policy and if we do so we will post the changes on the Website. It is your responsibility to check the Privacy Policy when you submit information to us. Your use of the Website will signify that you agree to any such changes.

11. Personal information and other websites

We are not responsible for the privacy policies and practices of other websites even if you accessed a third-party website using links from our website. We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

12. Amendments

We may, at any time and at our discretion, vary this, Policy. We will notify you, if we amend this Privacy Policy, by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change.

13. How to contact us

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 the email displayed on our website.