

## 1. Information and Documents

### 1.1. Collected Information

- 1.1.1. The Company obtains and collects general information from the Client upon his/her registration for verification procedures including documentation of personal information. In compliance with the KYC Policy, the Client must provide all required information and documents for verification means.
- 1.1.2. Personal information shall be collected by the Company including, but not limited to, full name, birth date, full address, occupation, financial capabilities, and contact details like phone number and email address. Such information and details will be used to set up and verify the trading account of the Client to be able to receive an assigned account number and access credentials.
- 1.2.3. Certain information and details will need documentations for further verification, including proof of identity and proof of residence. The Company collects the personal information of the Client as obliged by the affiliated banks and PSPs, and when, without limitation, he/she registers in the official website or when the Client initiates financial transactions in his/her account.

#### 1.2. Information Disclosure

- 1.2.1. While the Company may collect and store information, data, and other recordings in relation to its business, the Company is not obligated to provide any of its records to the Client or any third party.
- 1.2.2. The Company may disclose the information and record of the Client to authorized third parties or if it deems obligatory. All collected information and documentations are confidential and will not be sold, leased, publicized. The Company complies with strict privacy measures to protect the information of the Clients.
- 1.2.3. If the Client intends to obtain any information of another Client, he/she must send the request with a valid and clarified explanation via email subject to the approval of the Company. The Company reserves the right to refuse and reject any request regarding the provision of any corresponding recorded information.
- 1.2.4. While all information and documentations are confidential, the Company may still disclose all or some information of the Client to third-party affiliates or if deemed necessary. Information may be disclosed if, but not limited to:
  - A) Mandatory in compliance with a legal obligation
  - B) Necessary to protect and defend the Company's workforce, properties, and Clients
  - C) Such information is required to evaluate or investigate suspicious trading and financial activities

# 2. Security of Information

## 2.1. Protection

- 2.1.1. Certain software and systems are used by the Company to secure all procedures and activities conducted within its property. The encrypted technology Secure Socket Layer ("SSL") is used and additional security measures are imposed to protect the information collected through the official website.
- 2.1.2. Regardless of the strict privacy and safety measures taken by the Company, the Client acknowledges that he/she should not expect that his/her information will be private at all times.

### 2.2. Cookies

- 2.2.1. The Company uses cookies, which are files that allow the website to see how the Client navigates the web pages and accesses the websites. Information stored in cookies will remain private and will not be distributed to any third party or affiliates unless deemed obligatory.
- 2.2.2. The Client may block cookies using the web browser he/she is using. However, some website functions may not work accordingly. By continuing to use the website, the Client acknowledges and agrees with the Company's usage of cookies.