

## PRIVACY POLICY

### 1. CONFIDENTIALITY DECLARATION

1.1. This Confidentiality Declaration pertains to Capinex Capital Ltd, an international brokerage and clearinghouse, licensed under number BFX2024013, with its headquarters located at 1257 Bonovo Road, Fomboni, Comoros Union. The purpose of this statement is to safeguard the personal and financial information of our clients and website visitors, which we regard with the highest priority. This Privacy Statement details the procedures by which we collect, use, and protect your information. By accessing our website or establishing an account, you consent to the collection and utilization of your personal data in accordance with the practices outlined in this declaration.

### 2. ACQUISITION OF PERSONAL DATA

2.1. To facilitate account opening, manage transactions efficiently, and ensure the security of your assets, we collect necessary personal data. This information is crucial for evaluating your requirements and preferences accurately.

2.2. The personal data collected includes essential contact information such as your full name, postal address, telephone number, email address, and identification details. At the time of account creation, we also gather demographic information, including your date of birth, educational background, and occupation, in addition to details of your transactions with us. Furthermore, we assess your trading experience, estimated annual income, and net worth to determine your financial status.

### 3. UTILISATION OF PERSONAL DATA

3.1. Personal information is utilized solely for the purpose of delivering exceptional service and ensuring security. This data may be employed to verify your identity and contact details. Specifically, it may be used to assign a secure password and account number, establish and configure your trading account, monitor account activity, and facilitate communication related to your account. Additionally, this information aids us in enhancing our services, personalizing your browsing experience, and informing you about relevant products, services, or promotions that may be of interest.

### 4. AFFILIATES AND PARTNERS

4.1. In instances where it is necessary to provide the products or services you have requested, or to enable your participation in the offerings of our affiliates, we may disclose information to these entities. We may also form partnerships and alliances with other companies through joint marketing agreements to provide exceptional products and services that may benefit our clients. To ensure that your needs are met and that these products and services are delivered effectively and appropriately, we may share specific information with our partners, affiliates, and alliances. This sharing facilitates a better understanding of the most relevant and valuable offers. Your personal information will be used exclusively for the purposes defined in our agreements with partners and affiliates.

### 5. DISCLOSURE TO THIRD PARTIES

5.1. Except as explicitly stated otherwise, we do not sell, license, lease, or otherwise disclose your personal information to any third parties.

- 5.2. We retain the right to disclose your personal data to external parties when legally mandated to do so, including but not limited to regulatory bodies, law enforcement agencies, or other governmental authorities. Additionally, such disclosure may be necessary to protect our legal rights or assets.
- 5.3. To augment our offerings, we might recruit an outside firm to help with a range of internal duties like order fulfillment, customer support, satisfaction surveys, account processing, and other related support services and data gathering activities. We may share client information from our database with a third party to analyze and identify client needs and inform clients about product and service offerings. The utilization of the shared information is strictly confined to the execution of the task we have requested, and it must not be used for any other objective. Any third parties we share personal information with are obligated to safeguard that information in a manner comparable to our measures.

## 6. PROTECTION

- 6.1. Your submitted information is securely stored on our servers. All financial transactions conducted through our website are encrypted using SSL technology to ensure data security. If you have been assigned or have chosen a password for access to specific areas of our website, you are responsible for maintaining its confidentiality. Please refrain from disclosing your password to any third parties.
- 6.2. It is important to acknowledge that absolute security cannot be guaranteed for information transmitted over the Internet. While we will employ all reasonable measures to protect your personal information, we cannot guarantee its security during transmission to our website. The transmission of data is undertaken at your own risk. Once we receive your information, we will implement stringent protocols and robust security measures to minimize the risk of unauthorized access.

## 7. LIMITATION OF LIABILITY

- 7.1. Should you decide to engage with products or services provided by third-party companies, any personal information you disclose to these entities will fall outside the scope of our Privacy Statement. We disclaim any responsibility for the privacy practices or content of external websites to which we may provide hyperlinks. We do not exercise control over the use or protection of information collected by these third-party sites. If you access a co-branded or linked website, you may be required to provide personal or registration information. Please be advised that such information will be transmitted directly to the third party. We encourage you to review the privacy policy of any third-party website you visit.

## 8. ADVERTISING AND MARKETING COMMUNICATIONS

- 8.1. We or our authorized representatives may use your personal information to contact you via postal mail or telephone regarding offerings and opportunities that we believe may be of interest to you.
- 8.2. For clients currently utilizing our services, we will limit our communications to electronic channels—such as voicemail, email, or SMS—to inform you about products and services that are similar to those you have previously engaged with.
- 8.3. Should you wish to restrict the use of your personal information for marketing purposes, please indicate your preferences by selecting the relevant options during the data collection process. To amend your marketing preferences at any time, you may contact a representative from our Client Services. In the case of joint accounts, if one account holder opts out, this choice will extend to all account holders. Opting out must be done individually for each account you maintain with us.

## 9. USE OF “COOKIES”

- 9.1. We employ cookies to enhance website functionality and bolster the security of your trading

activities. Cookies are small data packets transmitted from our web server to your computer. These cookies do not store personal information, account details, or passwords. Instead, they enable the website to recognize that a page request originates from a user who has previously logged in.

- 9.2. To tailor our online advertising efforts on this website and across other platforms, we may grant reputable advertising firms access to anonymized usage data collected from our website. To facilitate this, we may utilize pixel tags (also known as clear gifs or web beacons) to monitor the specific web pages you visit. The data collected through these pixel tags by the advertising firms is non-personally identifiable.

## 10. UPDATES TO THE PRIVACY STATEMENT

- 10.1. This Privacy Statement may be subject to periodic revisions. When updates are made, the revised Privacy Statement will be promptly posted on our websites, accompanied by a notification. By accepting the terms, you consent to receive formal notifications via email regarding any changes to the Privacy Statement. Such notifications, along with our Customer Agreement, govern any disputes related to our Privacy Statement. We strongly advise you to regularly review this policy to stay informed about the data we collect, how it is used, and with whom it may be shared. Should you have any questions not addressed by this statement, please contact a representative from our Client Services.