



PRIVACY AND
CONFIDENTIALITY
POLICY
version 1

1. Introduction:

M4Markets is the brand name Trinota Markets (Global) Limited with Registration Number 8425037-1, regulated as a Securities Dealer by the Financial Services Authority of Seychelles with license number SD 035 (hereinafter called as the "Company" or "M4Markets" or "we" or "our" or "us").

Please read this Privacy and Confidentiality Policy to learn about your rights, what information we collect, how we use it and protect it.

2. Company's Commitment to Clients

This Privacy Policy sets out the ways in which the Company collects, uses and manages the personal information received from its visitors, active and/or potential clients who have terminated their business relationship with the Company (hereinafter referred as "the Client" and/or "you", "your") who are accessing or using the Company's website(s) and mobile applications.

The Company is committed to safeguard the confidentiality of your personal information or data it collects, uses and/or holds in accordance with the applicable data protection laws and regulations and particularly, the Data Protection Act of 2023 and any subsequent regulations or laws adopted by the Republic of Seychelles with reference to the data protection (hereinafter 'Data Protection Laws').

Pursuant to the Data Protection Laws, the Company with whom you have registered an account or have a business relationship with is the "Controller" of personal data collected through e-mails, mobile applications and other platforms and is the Company you should contact if you have questions about the use of your Personal Data.

The Company has established technical and other organizational measures and procedures as appropriate in order to safeguard and protect your information and privacy. For this purpose, the Company has also appointed a Data Protection Officer to ensure that the Company manages or processes all Personal Data in compliance with the applicable Data Protection Laws and regulations and in accordance with this Privacy Policy.

By accessing Company's website and by providing personal data and/or confidential information as per the Data Protection Laws and as per the provisions of this Privacy Policy, the Client accepts to be bound by the Company's Privacy Policy.

3. How and Why We Collect Your Personal Data

During the account opening process for a demo or a trading account, you are requested to complete and submit an application form by providing your personal information (hereinafter "Personal Data"). The provision of the information

submitted by you will enable us to evaluate the application and your eligibility to our services pursuant to the applicable laws and regulations governing the provision of our services. The same information will be used by the Company to contact you regarding the offered services.

The Personal Data collected by the Company might include, but are not limited, to the following:

- **Identity Data:** Name, surname, address, date and place of birth, gender, country of residence and citizenships, identity documents such as passport, ID, driving license, information which may be publicly available or contained in background check database;
- **Contact Data:** addresses and proof of residency documents, telephone numbers, e-mail addresses;
- **Tax and Financial Data:** FATCA & CRS declarations, information in relation to previous trading experience, source of wealth and source of funds, annual salary and respective pay slips and/or employment contracts, expected trading volumes, types of transactions, tax residence information and numbers, copy of the credit card used to fund the account, all and any other financial information which is required to establish and maintain a client account and/or process client's orders in accordance with the applicable laws and regulations;
- **Technical Data:** Client internet protocol address, browser information;
- **Marketing and Communication Data:** Client communication preferences and preference for receiving marketing materials from the Company.

In case you are using our app, we additionally collect the following information:

- **Device Information:** We collect information about the device you are using, such as your device ID, IP address, operating system, and app settings.
- **Usage Data:** We may collect information on how you interact with our app, including pages visited, features used, and other activity data.

In cases where the Client is legal entity, the Company shall have the right to request all the statutory/incorporation documents and all the relevant documents for all related individuals (directors, shareholders, beneficial owners).

Furthermore, it is to be noted that, periodically and subject to the characteristics of each client, we may also require provision of other information to improve the services performed and satisfy the regulatory

requirements. Most information will be requested directly from the client and/or any other authorized person by means of application forms or other forms as well as by maintaining registers of information provided to us during ongoing performance of services in favor of the clients.

Other than the information collected directly by you, the Company may also process information about your transactions with the Company like the products you trade with the Company and historical data of your transactions including, trading history or investments.

4. Data Retention

Subject to the applicable laws and regulations of the Financial Services Authority of Seychelles (hereinafter referred to as “FSA of Seychelles”), the Company will keep records containing your Personal Data for a period of five (5) years from the date of termination of the business relationship and for an additional period of two (2) years if it is requested by FSA of Seychelles, totalling 7 years.

5. Who Has Access to Your Personal Data

The Company shall not disclose to a third party, any of your confidential information unless it is required to do so by a regulatory authority of a competent jurisdiction, the provisions of applicable laws and regulations, there is a legitimate interest for such disclosure or duty to do so or you have requested from us to proceed with a disclosure and/or you have consented to; such disclosure shall occur on a ‘need-to-know’ basis, unless otherwise instructed by a regulatory authority. Provided that such disclosure takes place, the Company shall expressly inform the third party regarding the confidential nature of the information.

The Personal Data are treated as confidential and may be shared within the Company only to those employees and/or partners who need to know the specific information in order to operate, develop or improve our services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

The Client by accepting this Privacy Policy authorizes the Company to share and/or disclose personal information, which is submitted by the Client to the Company, with other entities of the M4Markets Group of companies for marketing purposes.

6. Lawful Basis for the Usage and/or Disclose of Personal Data

The Company collects and process Personal Data which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the Client and in order to comply with the applicable aforementioned data protection legislation and regulations governing the provision of investment services. In some cases, the Company may also process the Client’s Personal Data to pursue its legitimate interests or those of third parties, provided that

the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

In view of the above, the Company may use and/or disclose your personal information for one or more of the following purposes:

- In cases where it is required by law or a court;
- In cases where it is requested by FSA of Seychelles and/or any other regulatory authority;
- In cases where it is requested by fraud prevention agencies, third party authentication service providers, verification/screening service provider's and/or any relevant authorities who investigate or prevent fraud, money laundering and/or other illegal activities;
- In cases where it is necessary in order for the Company to defend or exercise its legal rights to any court and/or tribunal and/or arbitrator and/or financial ombudsman and/or governmental authority;
- To Company's professional advisors provide that in each and every case these professional advisors shall be informed about the confidential nature of such information and commit to the confidentiality obligations as set in this Privacy Policy;
- to confirm/verify your identity;
- to assess your appropriateness and/or suitability to the products and services we provide;
- to process your transactions;
- to manage the account, you hold with the Company;
- to provide you with transaction and post transaction related services;
- to inform you of products and/or services that may be of interest to you;
- to inform you of amendments of the law affecting our services to you and products as and when required;
- for internal business as well as record keeping purposes;
- to keep you updated on the issues that are relevant to your business relationship with us;

- to analyse statistical data to enable us to provide you with better products and/or services;
- to enhance the security controls of the Company's networks and systems;
- to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation;
- technological experts who are appointed by the Company to support the smooth operation of our systems platform providers;
- payment service provider's/credit institutions for facilitating the incoming and outgoing payments of the Clients;
- governmental authorities and regulatory bodies;
- data reporting service providers to meet our regulatory obligations;
- other companies belonging to the M4Markets Group of companies for marketing purposes.
- at Client's request.

The Company needs to comply with the Anti-Money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept to be able for the Company to demonstrate to the regulator that has acted in accordance with the legislation.

If there is no lawful basis, for the usage of your personal data as indicated above, your consent will be required. The Company will ask for your consent in regards to the provision of marketing information in relation to the products and services offered in accordance with the Client agreement between the contractual parties and/or any other mean of communication the Company may use from time to time. Note that you may withdraw such consent at any given time by contacting us.

7. Cookies

The Company uses cookies to gather information about client's access to the Company's website and other services the Company provides to the client.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated companies. It is noted that the information collected by such companies is not personally identifiable. To administer and improve the services offered by the Company's website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Most internet browsers are set up to accept cookies. If the client does not wish to receive cookies, he/she may be able to change the settings of the browser to refuse cookies or have the choice whether to accept a cookie or not. However, it is strongly recommended that the client allows cookies on the Company's website to ensure he/she has the best possible experience. Turning off cookies may result in reduced performance of the website and trading platform and may also impair the quality of the services that the Company provides in relation to the client's trading account.

Furthermore, we use cookies for re-marketing features in order to allow us to reach out to users who have previously visited our website(s) and have shown an interest in our products and services. Periodically, we may use third party vendors, such as Google and AdRoll, to display our ads over the internet to you, based on your previous use of our website(s). You can opt out this particular use of cookies at any time by visiting Google's Ads Settings page and the DoubleClick opt-out page or as they later update those facilities.

The Company uses session ID cookies and persistent cookies. A session ID cookie expires after a set amount of time or when the browser window is closed. A persistent cookie remains on your hard drive for an extended time period. You can remove persistent cookies by following directions provided in your web browser's 'Help' file.

For further details about our cookie policy and how our cookies work, read our Cookies Policy [here](#).

8. Security

The privacy and confidentiality of your personal information is of fundamental importance to us. We take all appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data and personal information.

The Personal Data that you provide in connection with opening an account (i.e., Economic Profile Questionnaire) with the Company are highly protected. This information can be accessed only by you using your own selected password and logins. The Company strongly recommends that your password is carefully kept and not to be shared with any third party. In addition, this information is safely stored in the Company's servers that only authorized personnel have access to it through

access rights. The Company encrypts all this information to prevent unauthorized parties from viewing or access such information.

9. Your Rights

You have the following rights in respect of your Personal Data in accordance with the Data Protection Laws:

- **Right of Access:** You have the right to be informed whether and under which circumstances the Company is processing your Personal Data and the Company is required to provide you with a copy of your Personal Data if and when you request so.
- **Rectification Right:** You can request to amend your Personal Data in order to correct or complete the provided Personal Data (up to date information).
- **Erasure Right:** You can request to delete/remove your Personal Data under certain circumstances, for instance if your consent has been withdrawn. The effect of such request is always subject to any other requirements imposed by applicable laws and regulations.
- **Right to Restrict Processing:** You may request from the Company to restrict the processing of your Personal Data if it is not accurate, it has been used unlawfully or it is not relevant anymore. The said right is not an absolute right and only applies in certain circumstances. In addition, when processing is restricted, the Company is still permitted to store the Personal Data, but not use it.
- **Right to Data Portability:** You may request to obtain your Personal Data in a readable format for your own purposes.
- **Right to Object:** You may request from the Company to stop processing your Personal Data, and the Company will do so if: a) the Company cannot demonstrate compelling legitimate grounds for the processing or b) the Company is processing Client's Personal Data for marketing purposes.
- **Right to Withdraw Consent:** You can withdraw any consent given to the Company at any time where the Company relies on consent to process your Personal Data.

10. Client Obligation

The Company is required to obtain and maintain Client's personal Data under the applicable laws and regulations. As such, the Client is always obliged to provide the

Company with accurate and complete information and to update the Company immediately regarding any changes to such information.

In case the Client fails to provide the requested Personal Data, the Company shall have the right to stop providing any services to the Client.

11. Legal Disclaimer

The Company will not be liable for misuse or loss of personal information/data resulting from cookies on the Company's site(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of client's personal information/ non- public data due to misuse or misplacement of any passwords, negligent or malicious.

12. Complaints in Regards to the Use of Personal Data

If you have grounds to believe that the Company does not appropriately use your personal data, you can further submit a complaint to the Information Commission of Seychelles.

13. Amendments to Policy

The Company reserves the right to make changes to this Privacy & Confidentiality Policy from time to time for any reason and the client will be notified of such changes by posting an updated version of this Privacy & Confidentiality Policy on the website. The client is responsible for regularly reviewing this Privacy & Confidentiality Policy and the use of this website after any such changes are published, shall constitute an agreement to such changes.

14. Legal Disclaimer

The Company reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process served. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's site(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious.

Further information on the Company's Privacy Policy is available upon request.



The Company's contact details are:

Tel: (+248) 4374220

Address: JUC Building, Office No.F4, Providence Zone 18, Mahe, Seychelles