

## Phyntex Group Limited

### PRIVACY POLICY

#### Introduction

We need to collect personal information from our customers and prospective customers as part of us daily business operations to provide them with our products and services and ensure that we can meet their needs when providing these products and services and when providing them with the relevant information.

Your privacy is of utmost importance to us, and it is our policy to protect and respect the privacy of individuals and the confidentiality of information. This Privacy Policy sets out how Phyntex Markets collects uses and manages your personal information that we receive from you or a third party with our provision of services to you or that we collect from your use of our services and/or our website and/or any other related websites and apps, including but not limited to those of the Company. In addition, the Privacy Policy informs you of your rights as regards the processing of your personal information.

Our Privacy Policy is regularly reviewed to ensure that any new obligations and technologies, changes to our business operations and practices are considered, as well as that the changing regulatory environment remains in line. Our most recent Privacy Policy will regulate any personal information we retain. Please note that your personal information will be used in connection with your employment contract or your contractual relationship if you are an existing and/or former employee of the Company, a job applicant, a contractor to the Company or a third-party service provider. This Privacy Policy applies to Phyntex Markets' processing activities for the personal data of its customers / potential customers, website visitors and employees. This Privacy Policy does not apply to websites operated by third parties and/or by any other organizations.

#### Who we are.

“Phyntex Group Limited is licensed in Mwali as an International Business Company (HY00823421) and as an International Brokerage and Clearing House (T2023344) under Mwali International Services Authority in Comoros Union with license number with registered address at Moheli Corporate Services Ltd, P.B. 1257 Bonovo Road, Fomboni, Comoros, KM. The website is owned and operated by the Phyntex Markets. Phyntex Markets is a trading name of Phyntex Group Limited.

#### Safeguarding the privacy of your personal data and protecting your privacy

The Company respects the privacy of all users who access its website(s) and is therefore committed to taking all reasonable steps to safeguard any customers, applicants and

website visitors who are existing or prospective. The Company keeps personal data of any customer/ potential customers in accordance with the applicable laws and regulations on data protection.

To ensure that your information always remains protected, we have the necessary and appropriate technical and organizational measures and procedures in place. We regularly educate and raise

awareness of the importance of maintaining, protecting, and respecting your personal information and privacy for all our employees. We consider breaches of the privacy of individuals very seriously and will impose suitable disciplinary measures, including dismissal if necessary.

When you register as a user on the Company's website(s) and/or services, the personal information you provide us with is classified as registered information that is protected in several different ways.

After logging in to the Client's Cabinet, you can access your registered information by entering username and a password that you select. It is your responsibility to ensure that only you are aware of your password and not disclosed to anyone else.

Registered information is securely stored in a secure location and is accessible via username and a password to only authorized personnel. All personal information is transferred over a secure 128-bit SSL connexion to the Company and all necessary measures are therefore, taken to prevent any unauthorized information parties from viewing such information.

Personal information provided to a company that is not classified as registered information shall also be kept in a secure place and shall be accessible only by username and password to authorized personnel. The transmission of information over the internet is not always completely secure, but by taking seriously

precautions, the company strives to protect your personal data. We will apply procedures and security features once we have received your information to attempt to prevent unauthorized access.

### **1. Personal data which we collect.**

To open an account with us, you must first complete the application form and submit it to us by filling out the information required. You are asked to disclose personal information by completing this application form to allow the Company to evaluate your application and

comply with the relevant rules and regulations. To inform you about its services, the company may also use the information you provide. The information that we may collect from you includes the following:

- Full name, address of residence and contact details (e.g., email address, telephone number, fax, etc.). Date of birth, birthplace, gender, citizenship.
- Information about your income and assets, including information about your fund and source, assets and liabilities, bank account details, trading statements, information on financial statements. -Trading account balances, trading operations, your inquiries, and our answers. -Data on whether you hold a significant public function.
- Details of profession and employment.
- Data for authentication (e.g., signature)
- Data on location.
- Trading results, expertise, and experience
- Verification information that includes information necessary for verifying your identity, such as a passport or driver's license (examples also include background information that we receive about you from public records or from other entities that are not affiliated with us); we may also collect other identifiable information, such as identification numbers and/or registration numbers for passport / tax.

Any other data commonly used to identify you and your trading experience that is relevant to us. providing you with our services. Through your use of our services, including through any of our websites, apps, account opening applications, our demo sign-up forms, webinar sign up forms, subscribing to news updates and from information provided during ongoing customer service communications, we obtain this information in several ways. This information about you may also be collected by us from third parties, such as through publicly available sources. We also keep records of your conduct in trading, including records of the following:

- Products that you trade and their performance with us.
- Historical data, including the amount invested, of the trades and investments you have made. Your preference for certain kinds of services and products.

From time to time (for example, through market research or surveys), we may voluntarily ask for other personal information. We may not be able to provide you with the requested product or service if you choose not to provide the information that we need to fulfil your request for a specific product or service.

In relation to the services, we provide to you and our business relationship with you, we may record any communications, electronic, telephone, in person or otherwise, we have with you. Such recordings will be our sole property and will be proof of the interactions between us. It is possible to record such telephone conversations without the use of a warning tone or any other further notice. In addition, we may have CCTV that will record your image if you visit any of our offices or premises.

If we receive personal information about an individual that is unsolicited by us and not necessary for the provision of our services, we will destroy the information securely (if it is lawful and reasonable for us to do so).

Lawful basis for the processing and purposes of your personal information Your personal data may be processed for the following reasons and for the following purposes: 1.

Execution of a contract

To provide our services and products, we process personal data, as well as information about our products and services based on the contractual relationship with our customers (i.e., to perform our contractual obligations). In addition, personal data processing takes place to be able to complete on boarding / acceptance procedures for our customers. In view of the above, to accept you as our customer, we need to verify your identity and we will need to use those details to manage your trading account with us efficiently to ensure that you get the best service from us. This may include, on our behalf, third parties carrying out credit or identity checks. For us to know who you are, the use of your personal information is necessary as we have a legal obligation to comply with certain regulatory obligations of Know Your Customer and Customer Due Diligence.

## **2. Fulfilments of a legal obligation**

As well as statutory requirements (e.g., anti-money laundering laws, financial services laws, corporate laws, privacy laws and tax laws), there are several legal obligations arising from the relevant laws to which we are subject. There are also different supervisory authorities (e.g., the SVG FSA) whose laws and regulations we are subject to. For credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls, such obligations and requirements impose upon us the necessary personal data processing activities.

These obligations, including customer boarding / acceptance, payments, and systemic risk management checks, apply at various times.

## **3. For the protection of legitimate interests**

We process personal data to safeguard the legitimate interests pursued by us or a third party. A legitimate interest is when we have a business or commercial reason for using your information. Despite that, it must not go unfairly against what is right and best for you. Examples of such processing activities include the following: Initiating legal claims in litigation procedures and preparing our Défense. Means and procedures that we undertake to ensure the IT and system security of the company, preventing potential crime, security of assets, admission controls and anti-intrusion measures. Installation of CCTV systems (e.g., for safety reasons at our premises). Business management measures and the further development of products and services. Sharing your personal data within the Phyntex Markets with a view to updating / verifying your personal data in accordance with the relevant compliance framework for anti-money laundering. Risk Administration.

#### **4. You have given your consent to**

Our storage and use of your personal data is based on your consent (if your consent is not required, other than for the reasons described or implied in this policy). You may withdraw your consent at any time, but any processing of personal data before your withdrawal is received will not be affected.

#### **5. Assessing the suitability of our services / products for customers**

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Providing you with products and services, or with information about our products and services, and reviewing your ongoing needs once you have successfully opened a trading account or subscribed to an update or webinar with us, we will need to use your personal information to carry out our services and fulfil us obligations to you. It is also in our legitimate interest to ensure that we provide the best products and services, so we can review your needs periodically to ensure that we benefit from the best possible products and services.

#### **6. To help us improve our products and services and to develop and market new products and services, including customer services**

We may use personal information provided by you from time to time through your use of the facilities and/or through customer surveys to help us improve our products and services. To ensure the highest standards when providing you with our products and services, it is in us legitimate interests to use your personal information in this way and to remain a market leader in the financial services industry.

#### **7. For a profile about you to form**

We may use personal information provided by you from time to time through your use of the facilities and/or through customer surveys to help us improve our products and services. To try to ensure the highest standards when providing you with our products and services, it is in our legitimate interests to use your personal information in this way and to continue to be a market leader in the financial services industry.

#### **8. To examine or resolve inquiries or disputes**

To investigate issues and/or resolve disputes with you, we may need to use personal information collected from you as it is in our legitimate interests to ensure that problems and/or disputes are investigated and resolved in a timely and effective manner.

#### **9. To comply with applicable laws, orders of court, other judicial proceedings, or requirements of any applicable regulatory authority**

To comply with any applicable laws and regulations, court orders or other judicial process, or the requirements of any applicable regulatory authority, we may need to use your personal information. Not only do we do this to fulfil our legal obligations, but also because it may be in us legitimate interest to do so.

#### **10. To send surveys to you**

We may send surveys to you from time to time as part of our customer feedback process. To try to ensure that we provide our services and products to the highest standards, it is in us legitimate interest to ask for such feedback. We may, however, also ask you to participate in other surveys from time to time, and if you agree to participate in other surveys, we rely on your consent to use the personal data we collect as part of that survey. All responses to any survey that we send out will be aggregated and depersonalized before the survey results are shared with any third parties, whether for customer feedback or otherwise.

#### **11. Analysing Data**

Our website pages and e-mails may contain web beacons or pixel tags or any other similar type of tools for data analysis that enable us to monitor the receipt of correspondence and count the number of users who have visited or opened our correspondence on our website. Why can your personal information (such as trading history) be aggregated on an anonymous basis (i.e., with your personal identifiers removed) with the personal information of our other customers so that more rigorous statistical analysis of general patterns can lead us to provide better products and services. We do not require a legal basis if your personal information is completely anonymity, as the information will no longer constitute personal information. If your personal information is not in an anonymity

form, it is in our legitimate interest, to ensure that the products and services we provide are relevant to the market, to continually evaluate that personal information.

## **12. Purposes for marketing**

To ensure that you are always kept up to date with our latest products and services, we may process your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns). We will either do so because of your consent, or if it is in our legitimate interest, if we send you marketing communications. We will not disclose your information to any outside parties to enable them to market it to you directly.

## **13. Legal announcements**

The law often requires us to advise you about certain modifications to goods or services or laws We may need to let you know about changes to the terms or characteristics of our products or services. To send you these legal notifications, we need to process your personal information. Even if you choose not to receive direct marketing information from us, you will continue receiving this information from us. 16. Restructuring of corporations

We may need to use your personal information in connection with that re-structuring or acquisition if we undergo a corporate re-structuring or part of it, or if all our business is acquired by a third party. Such use may include the sharing of your data in accordance with legal agreements as part of due diligence inquiries or disclosures. It is our legitimate interest if we comply with any legal / regulatory obligation we have towards you, to use your information in this way.

## **14. How We Get Your Consent**

Where your consent is required for our use of your personal information, such consent will be given in accordance with the express written terms governing our business relationship (which are available from time to time on our website(s) as amended). You have the right to withdraw your consent at any time by contacting us using the contact details set out in this Privacy Policy if we rely on your consent as our legal basis for the retention and processing of your personal information.

## **15. Storage of your personal data and period of retention**

It is of utmost importance to us to safeguard the privacy of your information, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will keep personal information in a combination of secure computer storage facilities and paper-based files and other records for as long as we have a business

relationship with you, and we will take the measures necessary to protect the personal information we hold from misuse, loss, unauthorized access, alteration, or disclosure.

We will remove any information that will identify you or we will safely destroy the records if we consider that personal information is no longer necessary for the purpose for which it was collected. However, for a significant period, we may need to maintain records. For example, for a period of five (5) years after our business relationship with you has ended, we are subject to some anti-money laundering laws that require us to retain the following:

A copy of the documents we used to fulfil our due diligence obligations to our customers. Evidence and records of transactions with you and your relationship with us are supported.

The personal information we hold in the form of a registered communication will also be kept in line with local regulatory requirements (i.e., 5 years after our business relationship with you has ended or longer if you have legitimate interests (such as dealing with a dispute with you) by telephone, electronically, in person or otherwise. If you have opted out of receiving marketing communications, we will keep your details on our removal list so that we know that you do not want these communications to be received.

We may keep your data for longer than 5 years if, for legal, regulatory, or technical reasons, we are unable to delete it.

#### **16. Choice to opt-out from gathering your personal data.**

You must inform the company by sending an email to [support@phyntexmarkets.com](mailto:support@phyntexmarkets.com) if you do not want us to use your personal information. We may not be able to continue to provide information, services and/or products requested by you if you decide to do so, and we will not be liable to you in this regard.

#### **17. Lawful Disclaimer**

As required by laws and regulations, the Company may disclose your personally identifiable information and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, legal process served or served by governmental, intergovernmental, or other regulatory bodies. The Company is not liable for misuse or loss of personal information or otherwise on the website(s) of the Company to which the Company has no access or control.

Due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or because of your acts or omissions or by a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not), the Company will not be liable for unlawful or unauthorized use of your personal information.

## **18. Changes to this policy on privacy**

From time to time, our Privacy Policy is reviewed to take account of new laws and technologies, changes to our operations and practices, and to ensure that the changing environment remains appropriate. We will post those changes to this Privacy Policy and other places we deem appropriate if we decide to change our Privacy Policy, so that you are aware of what data we collect, how we use it, and under what circumstances we disclose it, if any.

## **19. If you've got a complaint**

You can submit a complaint if you are concerned about any aspect of our privacy practices. This will be promptly acted upon. Please contact us via email at [support@phyntexmarkets.com](mailto:support@phyntexmarkets.com) to make a complaint.

## **20. How to get in touch with us**

Please e-mail us at [support@phyntexmarkets.com](mailto:support@phyntexmarkets.com) if you have any inquiries regarding this Privacy Policy.