



STARTRADER FINANCIAL MARKETS LIMITED

PRIVACY & SECURITY POLICY

Prior to offering our services to you, we require you to read this Privacy & Security Policy.

PRIVACY & SECURITY POLICY

1. ABOUT STARTRADER FINANCIAL MARKETS LIMITED

- 1.1 STARTRADER Financial Markets Limited ("STARTRADER") is an investment dealer (Full Service Dealer, excluding Underwriting) licensed and regulated by the Financial Services Commission ("FSC") under Licence Number GB24203371, pursuant to Section 29 of the Securities Act 2005, Rule 4 of the Securities (Licensing) Rules 2007, and the Financial Services (Consolidated Licensing and Fees) Rules 2008. STARTRADER provides access to a wide range of trading products and services to support traders and Introducing Brokers (IBs) in achieving their commercial objectives. The Company aims to combine competitive trading conditions with a client-focused approach. It is STARTRADER's mission to enable the business goals and personal ambitions of traders and IBs by delivering dynamic products, competitive trading parameters, and a strong customer experience.
- 1.2 If you have any questions about this policy or how we collect and use personal information about you, please contact us using the contact details provided below. We also have a dedicated Data Compliance Officer, who is responsible for data compliance issues.

Postal Address:

Suite 201, 2nd Floor, The Catalyst, 40 Silicon Avenue, Ebene Cybercity, Mauritius.

Email:

compliance@startrader.com

2. STARTRADER'S COMMITMENT

- 2.1 STARTRADER is committed to protect the privacy of your personal and financial information obtained to enable us to provide you with a secure website for your transactions. This policy confirms details on how STARTRADER manages the information provided to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services via our website(s) and app(s). STARTRADER will use your personal

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information in accordance with this Privacy and Security Policy and otherwise in accordance with Data Protection Act 2017 and the applicable Data Protection legislation(s).

2.2 Data protection regulations require that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. REASONS FOR COLLECTING PERSONAL INFORMATION

3.1 STARTRADER collects certain personal information in order that it may meet the needs of its customers. By collecting certain personal information, STARTRADER is able to monitor and improve the services which it offers to its existing and potential customers.

3.2 STARTRADER will use this information for the following purposes:

- verifying your identity;
- assessing the suitability of the products and services we provide;
- establishing and maintaining your account;
- providing our services to you;
- improving our services;
- regulatory requirements; and
- marketing.

4. PERSONAL INFORMATION COLLECTED FROM YOU

4.1 STARTRADER will collect and hold information about you when you complete an online application or other type of form or access and trade on your account through this website or another service we provide to you. The kind of personal information you give us may include (but is not limited to) name, address, date of birth, passport number, tax identification number, email address telephone number, employment and income information, credit/debit

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card information, transaction history and financial statements.

- 4.2 STARTRADER may derive information from your use of this website or another service we provide to you and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred to you or to which you link.
- 4.3 By opening an account with STARTRADER and by placing Orders and entering into transactions, you acknowledge that you will be providing personal information (which may include sensitive data) within the meaning of applicable data protection and privacy laws. You consent to the processing of that information by STARTRADER for the purposes of performing its obligations under this Agreement and administering the relationship between you and STARTRADER, including disclosure of the information to Affiliates both within and outside Mauritius, and in jurisdictions where STARTRADER conducts its business activities. Where required by law, STARTRADER will comply with applicable data protection regulations, including but not limited to the Data Protection Act 2017 or equivalent legislation.
- 4.4 STARTRADER needs certain information to carry out an agreement with you and you must provide this in order to enter into an agreement with STARTRADER to provide you with products and service. If you do not, we may not be able to offer you any products or services. Mandatory information fields are generally set out in the application.
- 4.5 Other correspondence or interaction (for example by email, telephone, post, SMS or via our website) between you and STARTRADER, will include personal information (such as names and contact details) in that correspondence. This may include enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organization.
- 4.6 STARTRADER may also collect details of phone numbers used to call our company and the date, time, and duration of any calls. Please note that if we record your calls to or from STARTRADER, we will inform you of this.

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5. USE OF PERSONAL INFORMATION

- 5.1 STARTRADER may keep and use such information to comply with any legal requirements or if it is necessary for our legitimate interest or for any one or more of the following purposes:
- a) To provide the services to you that you have requested including processing transactions.
 - b) To confirm your identity.
 - c) To maintain your personal profile.
 - d) To manage your account.
 - e) To contact you when necessary or appropriate in relation to the services being provided to you.
 - f) To keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of STARTRADER.
 - g) To manage and administer the products and services provided to you.
 - h) To provide you with information regarding the products and services offered by STARTRADER.
 - i) To develop an understanding of the products and services that you may be interested in obtaining from STARTRADER.
 - j) To provide you with information or opportunities that we believe may be relevant to you.
 - k) To tailor the website or other services we provide to you to your needs and interests.
 - l) To create anonymized statistical data.
- 5.2 You consent to STARTRADER using your personal information for the above-stated purposes.
- 5.3 Where we use your personal information for marketing purposes to inform you about STARTRADER's products and services that might be of interest to you, you always have the right to 'opt out' of receiving such a communication.
- 5.4 You can exercise the right at any time by contacting us using the details provided at the start of this policy. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you "opt-out" of our marketing materials, you will be added to our 'suppression list' to ensure we do not accidentally send you further marketing. Where you unsubscribe from any postal marketing, you may initially still receive some content which has already been printed or sent, but we will remove you from any future campaigns. We may still need to contact your administrative for operational purposes, but we will make sure that those communications do not include direct marketing.

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- 5.5 If you are an existing customer or are acting as a business we use your contact details as necessary for our legitimate interests in marketing to you and maintaining a list of potential customers.
- 5.6 If you are not an existing customer, and are not acting as a business, we will only contact you for marketing purposes with your consent (whether we have collected your details directly from you, or through a third party).
- 5.7 STARTRADER will only use your personal information for the purposes for which it collected it as set out in this policy, unless STARTRADER reasonably considers a need to use it for another reason and that reason is compatible with the original purpose. If STARTRADER needs to use your personal information for an unrelated purpose, STARTRADER will notify you and will explain the legal basis which allows STARTRADER to do so.

6. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 6.1 STARTRADER does not sell, license, or otherwise disclose your personal information to third parties for marketing purposes. We do use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

STARTRADER may be required to disclose your personal information to the Financial Services Commission of Mauritius and, where applicable, to other regulatory, supervisory, or governmental authorities in Mauritius, or any other jurisdiction in which STARTRADER conducts business or is legally required to do so. STARTRADER may also disclose your personal information to:

- a. Financial institutions and other similar organizations that it deals with in the course of its corporate activities, or those that are nominated by you.
 - b. External service providers and professional advisers (which may be located overseas) that provide services to STARTRADER.
 - c. Any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor, or accountant.
 - d. Any third parties where this is necessary to process a transaction or provide services which you have requested; or any authority to whom STARTRADER is required to disclose such information by law.
- 6.2 In the event that STARTRADER is subject to negotiations for the sale of its business (whole or party of), or sold to a third party or undergo a re-organization, you agree that any of your

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personal information which we hold may be disclosed to such party or its advisors as part of any due diligence process for the purpose of analyzing any proposed sale or re- organization or transferred to that re-organized entity or third party and used for the same purposes as you have agreed to under this Agreement.

7. YOUR RIGHTS

- 7.1 You are not required to provide any personal information requested by STARTRADER. However, without that information, STARTRADER may be unable to open an account for you, where the information is requested in an application form, or to provide you with any other services, information, or assistance you have sought.
- 7.2 Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the FSA. Under certain circumstances, by law you have the right to:
- a) **Be informed in a clear, transparent and easily understandable way** about how we use your personal information and about your rights. This is why STARTRADER is providing you with the information in this policy. If you require any further information about how we use your personal information, please let us know.
 - b) **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information STARTRADER holds about you and to check that STARTRADER is lawfully processing it. STARTRADER may charge a nominal fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.
 - c) **Request a correction** of the personal information that STARTRADER holds about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - d) **Request an erasure** of your personal information. This enables you to ask STARTRADER to delete or remove personal information where there is no good reason for us to continue to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - e) **Object to processing** of your personal information where STARTRADER is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to STARTRADER using your information on this basis and STARTRADER does not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where STARTRADER is processing your personal information for direct marketing purposes.

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- f) **Request a restriction** for processing your personal information. This enables you to ask STARTRADER to suspend the processing of personal information about you, for example if you want STARTRADER to establish its accuracy or the reason for processing it.
- g) **Request a transfer** of your personal information to another party where you provided it to STARTRADER and STARTRADER is using it based on your consent, or to carry out a contract with you, and STARTRADER processes it using automated means.
- h) **Withdraw your consent.** In the limited circumstances where STARTRADER is relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once STARTRADER has received notification that you have withdrawn your consent, STARTRADER will no longer process your information for the purpose or purposes you originally agreed to, unless STARTRADER has another legitimate interest in doing so.
- i) **Lodge a complaint.** If you think that STARTRADER is using your information in a way which breaches data protection law, please contact us in the first instance using the contact details provided in section 1.2 of this Policy. You also have the right to raise a complaint with your national data protection supervisory authority.

8. UPDATING YOUR INFORMATION

- 8.1 You may inform STARTRADER at any time that your personal details have changed or that you wish STARTRADER to review, verify, correct or request erasure of your personal information, withdraw your consent to the processing or request that we transfer a copy of your personal information to another party. Please contact us via email at info@startrader.com.
- 8.2 STARTRADER will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

9. ACCESSING YOUR INFORMATION

- 9.1 Under the relevant data protection legislation, you have, subject to certain exceptions, the right to obtain copies of any personal information which STARTRADER holds about, the purposes for which they are being or are to be processed, and the recipients or classes of recipients to whom such information is or may be disclosed. You are entitled to inform STARTRADER of any inaccuracy in your personal information.
- 9.2 If you wish to access any personal information STARTRADER may hold or wish STARTRADER to

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correct any misinformation, please notify us in writing using the address provided at the start of this policy. STARTRADER may charge a fee (details of which are available upon request) for providing access to the information to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested.

- 9.3 STARTRADER may need to request specific information from you to help to understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- 9.4 Please consider your request responsibly before submitting it. STARTRADER will respond to your request as soon as possible. Generally, this will be within one month from the date your request was received, if the request is going to take longer to deal with, STARTRADER will let you know.
- 9.5 If you make a written request to us, we will also correct, delete and/or block personal information from further processing if that information proves to be inaccurate.
- 9.6 Please note that pursuant to such Data Protection Regulations certain information may be exempt from disclosure or STARTRADER may be unable to disclose information you request.

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10. COOKIES AND WEBSITE INFORMATION

- 10.1 STARTRADER uses cookies (and other tools such as web page counters or other analytics tools) to gather information about your access to this website and other services we provide to you. Cookies are small pieces of information which use a unique identification tag and are stored on your device as a result of you using this website or other service we provide to you. STARTRADER uses this as necessary for our legitimate interests in administering our website and to ensure it operates effectively and securely.
- 10.2 We, or third-party advertisers, may also use this information to serve adverts on you. Where those adverts are targeted, this may involve using website information and information we (or our third-party advertisers) have obtained from third parties. This will not include information such as your name or contact details. Where our adverts are displayed to you using your information, your information is used as necessary for our legitimate interests in marketing to you.
- 10.3 We keep this website information about you until the relevant cookie expires or is removed by you.
- 10.4 When cookies are used by us, they collect statistical and factual information about how you use our services. Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we provide to you in relation to your account.
- 10.5 Our website may, from time to time, contain links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

11. CONTENT INFORMATION

- 11.1 This is information about you which you provide when you post content on STARTRADER's website, social media and any other STARTRADER's sites. This may include reviews,

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photographs, videos, and other content.

11.2 We may display and publish this information on our platforms as part of our contract with you or as necessary for our legitimate interests in providing content to our users.

11.3 This information is kept for as long as you have an account with us and may be retained and displayed indefinitely after you close your account.

12. INFORMATION COLLECTED AT OUR PREMISES

12.1 VISITOR INFORMATION

STARTRADER collects information about visitors to our premises. STARTRADER may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. If you have an accident at our premises, this may include a record of your accident.

12.2 CCTV

STARTRADER may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes.

12.3 STARTRADER uses this information as necessary for our legitimate interests in administering your visit, ensuring site security and visitor safety, and administering parking.

13. STORAGE OF INFORMATION

13.1 STARTRADER's registered office is located in Mauritius. Our primary data servers may be located in Mauritius or other jurisdictions where STARTRADER conducts its operations or engages service providers. Where required to perform our contractual obligations to you, or for legitimate business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside of Mauritius and/or the European Economic Area (EEA).

13.2 You acknowledge and agree that your personal information may be transferred within or outside Mauritius, the EEA, or other jurisdictions where STARTRADER operates or is required to disclose such information. You further agree that STARTRADER may, where required, furnish relevant information concerning your Trading Account(s) to any person or entity who we reasonably believe is seeking such information in good faith for reference or credit assessment purposes. The information we share may affect your ability to obtain credit.

13.3 STARTRADER only transfers personal information to organizations outside of Mauritius where STARTRADER has assessed such organizations as having appropriate controls and safeguards in place to protect your personal data.

13.4 Some of the countries or organizations outside of Mauritius or EEA to which we may transfer your information may be subject to data protection regimes that are not considered equivalent to those

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of the EEA. Where transfers occur to countries that are not recognized as providing adequate protection of personal data, STARTRADER will take reasonable steps to ensure that appropriate safeguards are in place to protect your information.

- 13.5 Such transfers may be necessary for purposes related to the operation of your Account, including but not limited to: processing your instructions and generating confirmations, maintaining control systems, operating management information systems, carrying out credit and identity checks, and enabling staff of our Affiliates who share responsibility for managing your relationship from other offices to access relevant information.
- 13.6 You acknowledge and agree that, where required for the provision of our Services, we may transfer your information to service providers and Affiliates of STARTRADER, including where those persons may be located outside of the EEA or Mauritius. You consent to STARTRADER processing and disclosing such information in accordance with STARTRADER's Privacy and Security Policy published on our website(s), as may be updated from time to time. If we transfer data to countries or organizations outside of Mauritius that does not have an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by the EU or a data protection authority) are put in place where required. To obtain more details of these safeguards, please contact us.

14. DATA SECURITY

- 14.1 STARTRADER takes security very seriously and adopts industry and information security best practices to protect your personal information and ensure it is not accessed by unauthorized persons. Measures include encryption of data during transmission, strong authentication mechanisms and secure access to machines and data.
- 14.2 STARTRADER has put in place appropriate internal security measures to prevent your

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personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, STARTRADER limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on STARTRADER's instructions and they are subject to a duty of confidentiality.

- 14.3 STARTRADER has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

15. RETENTION OF INFORMATION

General retention policy

- 15.1 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 15.2 Generally, STARTRADER will keep your information for a period of five (5) years. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Legal Claims

- 15.3 Where STARTRADER considers there to be a risk to defend or bring legal claims, STARTRADER may retain your personal information as necessary for a legitimate interest in ensuring that STARTRADER can properly bring or defend legal claims. STARTRADER may also need to share this information with insurers or legal advisers. How long STARTRADER keeps this information will depend on the nature of the claim and how long STARTRADER considers there to be a risk that we will need to defend or bring a claim.
- 15.4 In some circumstances STARTRADER may anonymize your personal information so that it can no longer be associated with you, in which case STARTRADER may use such information without further notice to you.

16. YOUR CONSENT

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- 16.1 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By accessing this website or other service we provide to you, you consent to STARTRADER collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

17. AMENDMENTS TO POLICY

- 17.1 STARTRADER may make changes to this Privacy and Security Policy from time to time for any reason and will notify you of such changes by posting an updated version of this policy on this website or where appropriate, by email.
- 17.2 You are responsible for regularly reviewing this Privacy and Security Policy and if you use this website or other service we provide to you after any changes are published, any such use shall constitute your agreement to those changes.