

# **PRIVACY POLICY**

## **FINALTO INTERNATIONAL LIMITED**

Please view the following Privacy Policy which clearly explains how Finalto International Limited, a company incorporated and existing under the laws of Saint Vincent and the Grenadines, under Company Number 27030 BC2023 (“the Company”, “we”, “our” or “us”) collect, process, store, and protect Client information. Our Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current Privacy Policy displayed on our website.

The protection of privacy and the safeguarding of our clients’ personal data is of great importance to us. The Company is committed to being transparent about how it collects and uses that data and to meeting its global and national data protection obligations. If you have any questions in relation to this policy or the processing of your personal data please contact us at [privacy@markets.com](mailto:privacy@markets.com).

This privacy policy aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website.

Personal data means any information about an individual from which that person can be identified. We do not collect or use sensitive personal data such as data concerning race, religion or political affiliations.

## Consideration of Personal Information Privacy

We are committed to being open and transparent about how we manage your personal information. Where our documents or interactions with you ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

## Collection of Personal Information

The company collects the necessary information required to provide you with the services you require. To this end, the company gathers information from you and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources which help us profile your requirements and preferences and provide better services to you. Although you are not required to provide the Company with any of the personal information that we may request please note that failure to do so could result in the Company not being able to open your account or provide you with the services you require.

We may collect and process the following information as necessary to provide you with the required services:

- **Identity Data:** first name, maiden name, last name, username or similar identifiers, marital status, title, date of birth and gender.
- **Contact Data:** billing address, delivery address, email address and telephone numbers.
- **Financial Data:** bank account details, bank account statements; source of funds, source of wealth; payment card details.
- **Transaction Data:** details about payments to and from you and other details of products and transactions you have placed via our services and/or products. We will also
- **Technical Data:** cookie information, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data:** your username and password, transactions or orders made by you, your interests, preferences, feedback and responses to our marketing campaigns or surveys.
- **Usage Data:** information about how you use our products and services.

We may process your conversations with us for monitoring and regulatory purposes.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may derive from your personal data but is not considered “personal data” in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature/ product or service we provide.

## Use of Personal Information and Disclosure (including Overseas)

The information collected is required to enable us to provide services to you including to register as a new client, to process and deliver your orders including managing payments, fees, charges and collect monies owed to us, to manage our relationship with you such as notifying you about changes to our terms, to administer and protect your business, to improve our products/services and customer relationship. This

information helps us to improve services, establishing and managing your account, reviewing your ongoing needs, enhancing customer service, customize your browsing experience and inform you of additional products, services or promotions relevant to you. If you do not want to receive information of this nature for any reason, please contact us at the following email address: [privacy@markets.com](mailto:privacy@markets.com).

We may disclose your personal information to:

- other companies within our group, our agents, employees and representatives;
- credit reporting or reference agencies;
- financial institutions and other similar organisations in connection with our corporate activities or that are nominated by you;
- external service providers and professional advisers that provide services to us such as account processing, fulfilment, Client service, Client satisfaction surveys or other data collection activities relevant to our business;
- credit providers, collection agencies, courts, tribunals and regulatory authorities as agreed or authorised by law;
- government agencies including law enforcement and other public and regulatory authorities which may include authorities outside your country of residence. Without limitation to the generality of the foregoing, we may disclose personal information, where we are required to comply with certain obligations such as obligations arising under: The Foreign Account Tax Compliance Act (FATCA), the OECD Common Reporting Standard (“CRS”) as well as any obligations arising under any laws or regulations of the United States Internal Revenue Service (“IRS”) to which we may be required to adhere to;
- any organisation or any persons acting on your behalf;
- partners, affiliates and alliances and introducing brokers with whom we have a mutual relationship;
- Where you have been introduced to us, the person responsible for the introduction may have access to your information. You hereby unambiguously and unequivocally consent to the sharing of information with such a person; and
- anyone authorised by an individual, as specified by that individual or the contract.

All such third parties shall only use your personal information in accordance with our instruction and shall be prohibited from using your personal information for any other reason, except where legally obliged under applicable law.

## Integrity and Protection of Personal Information

Whilst we attempt to ensure that all the information we hold about you is current, accurate and complete, we urge you to promptly notify us of any changes to the personal information that we hold about you.

Personal Information is safely stored on secure servers that only authorised personnel have access to, via password. The company makes all necessary efforts to prevent unauthorised parties from viewing any such information.

## Statistical Information and Cookies

We collect statistical information about visitors to our websites such as the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded. This information is used to evaluate and improve the performance of our websites. Other than statistical information, we do not collect any information about you through our website unless you provide the information to us.

You should be aware that the company uses cookies to enhance the performance of our website. Cookies used by the company do not contain personal information or other sensitive information. The company may share website usage statistics with reputable advertising companies and with its marketing companies. The information collected by the advertising company is not personally identifiable.

To administer and improve the 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 our behalf. These cookies do not contain any personally identifiable information.

You have the right to accept or decline cookies. Please see our Cookie Policy for further details on the cookies we use.

## Regulatory Disclosure

The Company reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings. Such disclosure

shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, we shall expressly inform the third party regarding the confidential nature of the information.

### Restriction of Responsibility

The Company is not responsible for the privacy policies or the content of those sites to which it may link. The company has no control over the use or protection of information provided by a Client or collected by those sites. Whenever a Client elects to link to a co-branded website or to a linked web site the Client may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

### Your Consent

By accessing this website or by submitting an application/form to open an account with the company, you give your consent to collect, maintain, use and disclose personal information about you, provided by you or by another person as described above.

### Contact Us

If you want to make a general enquiry about our privacy policy, change your personal information, access your personal information or make a complaint, please contact us by email at [privacy@markets.com](mailto:privacy@markets.com).