

As part of our daily business operations, we need to collect personal information from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services as well as when providing them with the respective information.

Personal information we collect

In order to open an account with us, you must first complete and submit an application form to us by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant rules and regulations. The information you provide may also be used by the Company to inform you regarding its services.

The information that we may collect from you includes the following:

Full name, residential address and contact details (e.g: email address, telephone number, fax etc.)

information about your income and wealth, including details about your and source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;

Profession and employment details.

verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us); furthermore, we may collect other identifiable information such as identification numbers and/or Passport/Tax registration numbers.

We obtain this information in a number of ways through your use of our services including through any of our websites, apps, the account opening applications, our demo sign up forms, webinar sign up forms, subscribing to news updates and from information provided in the course of ongoing customer service communications. We may also collect this information about you from third parties such as through publicly available sources. We also keep records of your trading behaviour, including records regarding the following:

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products you trade with us and their performance;

historical data about the trades and investments you have made including the amount invested;

your preference for certain types of products and services.

Who may we disclose personal information to?

We may ask for other personal information voluntarily from time to time (for example, through market research or surveys). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service. We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice. Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with our clients (i.e., so as to perform our contractual obligations). In addition, processing of personal data takes place to be able to complete our client on-boarding/acceptance procedures.

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements (e.g., anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). There are also various supervisory authorities whose laws and regulations we are subject to (e.g. the IFSC). Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Despite that, it must not unfairly go against what is right and best for you. Examples of such processing activities include the following:

Our storage and use of your personal data is based on your consent (other than for the reasons described or implied in this policy when your consent is not required). You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected.

To assess the appropriateness of our services/products for the Clients

To provide you with products and services, or information about our products and services, and to review your ongoing needs

To help us improve our products and services, including customer services, and develop and market new products and services

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

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

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

When and how do we obtain your consent?

We may process your personal data for one or more lawful bases of processing (“Lawful Bases”) depending on the specific purpose for which we are using your data.

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To be compliant with the legal and regulatory requirements

To pursue our legitimate interests.

Where our use of your personal information does not fall under one of these three Lawful bases, we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

Transfers outside of the European Economic Area (EEA)

We may transfer your personal information outside the European Economic Area to other RRR Capital as well as service providers (i.e. processors) who are engaged on our behalf. To the extent we transfer your information outside the EEA, we will ensure that the transfer is lawful and that processors in third countries are obligated to comply with the European data protection laws or other countries’ laws which are comparable and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46. If we make transfers to processors in the USA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements.

In view of the above, your personal information may be processed by staff in the RRR Capital Group operating outside the EEA who work for us, another RRR Capital Group entity or for one of our service providers. Such staff may be, among others, engaged in the fulfilment of your requests, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and processing. The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Cookies

Internet cookies are small pieces of data sent from our website(s) to your browser and stored on your computer's hard drive when using our website(s), and they may include a unique identification number. The purpose of collecting this information is to provide you with a more relevant and effective experience on our website(s), including the presentation of our web pages according to your needs or preferences.

Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website(s) if you choose to disable the cookie acceptance in your browser, particularly in the Company's Members Area and other secure parts of our website(s). We therefore recommend you to enable cookie acceptance in order to benefit from all our online services.

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.

If you would like a copy of such arrangements, please contact us using the contact details below.

Legal Disclaimer

The Company may disclose your personally identifiable information as required by rules and regulations 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 pursuant to governmental, intergovernmental or other regulatory bodies. The Company shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due

to your acts or omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

Changes in this Privacy Policy

The Company may disclose your personally identifiable information as required by rules and regulations 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 pursuant to governmental, intergovernmental or other regulatory bodies. The Company shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

If you have a complaint

If you have a concern about any aspect of our privacy practices, you can submit a complaint. This will be acted upon promptly. To make a complaint, please contact us via email at support@rrrcapital.com.