

# INVESTAIN

Privacy Policy

### **Privacy Policy**

The services provided on <u>www.investain.com</u> are provided by INVESTAIN Ltd, a company incorporated with limited liability under the laws of Securities Act 2005, Securities Rule 2007, and Financial Services Rules 2008, under registration number **GB24202963.** INVESTAIN Ltd is registered under the Financial Services Commission of Mauritius as an Investment Dealer. We hold a valid license with the license number **GB24202963**, whose registered address is **Ground Floor**, **Ebene House**, **33 Hotel Avenue Cybercity**, **Ebene**, 72201, **Mauritius**.

### DISCLAIMER

We are licensed to engage in proprietary trading on regulated exchanges. All trading activities are subject to the terms and conditions set forth by **Financial Services Commission of Mauritius**. We do proprietary trading only; we do not provide investment advice or management services. The analysis, opinions, commentaries, or research-based content found on our website are provided solely for informational and educational purposes. It is important to note that this content is not, in any circumstances, intended to serve as an offer, recommendation, advice, or solicitation to engage in buying or selling activities.

### 1. General

- INVESTAIN observes the requirements of the applicable data protection laws in Mauritius, specifically the Data Protection Act 2017, as well as associated Executive Regulations and further guidelines of global Data Protection rules.
- This policy outlines the basis on which we will process any personal data we collect from you or that you provide to us, along with our terms of use and any other documents referred to in it.
- To learn about our policies and procedures pertaining to your personal data, please carefully read the following.
- By visiting <u>investain.com</u> you are accepting and consenting to the practices described in this Policy.
- We teach our staff members who deal with personal data to respect people's privacy and the confidentiality of customer information. We take privacy violations extremely seriously, and if necessary, we will take appropriate action—like firing—for any such violations.
- We have designated a data protection officer by this law to make sure that the handling of personal data abides by both this law and this policy.

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### 2. Information we collect from you.

We will collect and process the following data about you:

- Information you give us:
- This is personal data that you provide to us through completing forms on <u>investain.com</u> or communicating with us via phone, email, or other means. It contains data you submit when you sign up to use our website, file a complaint about an issue with it, or get in touch with us to talk about any matter pertaining to your account.
- Your name, address, date of birth, phone number, email address, financial, tax, and payment information, personal information, picture ID, and other details may be among the details you provide to us. The majority of this data is directly obtained by us from our clients via account applications or other forms of submission, as well as from keeping track of client data supplied during regular client support. In order to comply with specific regulatory requirements, we might also collect information from other sources.
- We may occasionally voluntarily request additional information from you (for instance, through surveys, market research, or exclusive financial promotion offers) so that we can better serve you and consider your needs.
- Information we collect about you:
- Website: when visiting our site, we will automatically collect the following information:
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, and operating system and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse- overs), methods used to browse away from the page, and any phone number used to call our customer service
- Telephone Discussions: In each of your discussions with members of our staff we may collect the following information about your call: date and time, personal details, any changes registered after the opening of your account and any other significant information which we believe will assist in the efficient operation and maintenance of your account with
- <u>Information we receive from other sources:</u> We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit

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reference agencies). We use this information to, amongst other matters, assist us in AML/KYC

#### 3. COOKIES

Cookies are used by our website to identify you from other visitors. This enables us to make improvements to our website and gives you a positive browsing experience. Please read our Cookies Policy for more specific information.

#### 4. TECHNOLOGY IMPROVEMENTS

We are constantly searching for ways to leverage technological advancements to increase the effectiveness and functionality of the website for users. This could entail modifying how we gather and utilize personal data. At the time of any change in technology, you will be informed of its impact and how it might affect your privacy.

#### 5. LINKS TO THIRD PARTY WEBSITES

Links to external third-party websites that could be useful to users may be found on our website. However, please be aware that our privacy policy does not apply to third-party websites, nor are they bound by our privacy policies or procedures.

#### 6. HOW WE USE THE INFORMATION

- We use information held about you in the following ways from the Information you give to us:
- to fulfill our responsibilities resulting from any agreements we may have with you and to give you the information, goods, and services you ask for.
- to inform you about additional goods and services we provide that are comparable to those you have already requested or consented to.
- to send you information about goods or services we believe you might find interesting, or to allow designated third parties to do so. Please check the appropriate box located on the form where we collect your data, send us an email at support@investain.com, or tell us if you do not want us to use your data in this manner or to give your information to third parties for marketing purposes.
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- 1. Information we collect about you we will use as follows:
  - to manage our website and for internal purposes, such as data analysis, testing, troubleshooting, research, statistical analysis, and surveying.

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- to make changes to our website so that information is displayed as efficiently as possible for you and your computer.
- to allow you to participate in interactive features of our service, when / if you choose to do
- $\circ$  In an effort to maintain the security and safety of our website.
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and,
- to make suggestions and recommendations to you and other users of our site about products or services that may interest you or
- 2. Information we receive from other sources:
  - We will merge this data with the information you provide and the data we gather about you. Depending on the kinds of information we receive, we will use this information along with the combined information for the aforementioned purposes.

### 3. DISCLOSURE OF YOUR INFORMATION

- Depending on the product or service concerned and restrictions on sensitive information, personal information that we obtain may be disclosed to:
  - other companies owned by the INVESTAIN group of companies that provide financial services.
  - service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance or other
  - to brokers with whom we have a mutual
  - credit provider, courts, tribunals and regulatory and government tax authorities as agreed and authorized by law.
  - reference and credit reference This includes exchanging information with other companies and organizations for the purposes of money laundering regulations, financial crime, fraud protection and mitigation of credit risk; and,
  - anyone authorized by you, as specified by you or by law through a Power of Attorney
  - You agree that We have the right to share your personal information with:

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- Advertisers and ad networks who need the information to choose and show you and other people relevant advertisements. While we do not give our advertisers access to personally identifiable information about specific users, we do give them aggregate user data (e.g., 500 men under 30 have clicked on their advertisement on any given day). Such aggregate data may also be used to assist advertisers in reaching the desired audience. We might use the personal information we've gathered about you to show our advertisers' ads to the appropriate audience in accordance with their requests.
- analytics and search engine providers that assist us in the improvement and optimization of our site; and,
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with
- We will disclose your personal information to third parties:
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or
- In the event that INVESTAIN, or a significant portion of its assets, are purchased by a third party, one of the transferred assets will be the personal information it has about its clients.
- If we have a legal obligation to share or disclose your personal information, if we need to enforce our terms of service or other agreements, or if we need to protect the property, rights, or safety of INVESTAIN, our clients, or others. This involves sharing data with other businesses and institutions in order to prevent fraud and lower credit risk.

#### 4. WHERE WE STORE YOUR PERSONAL DATA

- We hold personal information in a combination of secure cloud storage facilities, held electronically on off-site back-up servers or held within multiple cloud servers, and we take all necessary steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or
  - The data that we collect from you may be transferred to, and stored at, a destination selected by submitting your data, you agree to this

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transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

- All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- Unfortunately, the transmission of information via the Internet is not completely Although we will do our best to protect your personal data, we cannot guarantee the security of your data.

### 5. YOUR RIGHTS

• You can request that not use your personal information for marketing. If we plan to use your data for such purposes, or if we plan to disclose your information to any third party for such purposes, we will normally notify you (prior to collecting your data). On the forms we use to gather your data, you can check specific boxes to exercise your right to prevent such processing. Additionally, you can always use this right by sending an email to <u>compliance@investain.com</u>.

### 6. ACCESS TO INFORMATION

• You have the legal right to see the information that is kept on file about you. You may use your right of access in compliance with the law. If you'd like a copy of the data, we have on file

### 7. CHANGES TO OUR PRIVACY POLICY

• Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy

### 8. <u>CONTACT FOR COMPLAINTS</u>

 If you consider that any action of ours breaches this policy statement or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact the client services department or our Compliance Department at the following address <u>compliance@investain.com</u>

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