



STARTRADER LIMITED

PRIVACY & SECURITY POLICY

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

PRIVACY AND SECURITY POLICY

1. ABOUT STARTRADER LIMITED

- 1.1 STARTRADER Limited ("STARTRADER") is a company duly incorporated in Seychelles and registered by the Financial Services Authority ("FSA") under Incorporation Number 8427362-1. STARTRADER provides access to a wide range of trading products and services to support traders and Introducing Brokers ("IBs") in achieving their commercial objectives. STARTRADER 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 Privacy and Security Policy or how we collect and use personal information about you, please contact us using the contact details provided below.

Postal Address:

STARTRADER LIMITED

Suite 3, Global Village,

Jivan's Complex,

Mont Fleuri, Mahe,

Seychelles

Email: compliance@startrader.com

2 STARTRADER'S COMMITMENT

- 2.1 STARTRADER is committed to protect the privacy of your personal information obtained to enable us to provide you with a secure website. This Privacy and Security Policy confirm details on how STARTRADER manages the personal information provided 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 other platforms. STARTRADER will use your personal information in accordance with this Privacy and Security Policy and otherwise in accordance with the laws of Seychelles and the applicable Data Protection legislation(s).
- 2.2 Data protection regulations require that the personal information we hold about you must be:

STARTRADER Limited
Privacy & Security Policy

- 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.
- 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, use 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 other service provided by STARTRADER. The personal information collected may include, without limitation, your name, residential address, date of birth, passport or other government-issued identification number, tax identification number, email address, telephone number, employment and income information, credit or debit card details, transaction history and financial statements.
- 4.2 STARTRADER may derive information relating to your use of this website or any other services provided by STARTRADER and may store such information together with your personal profile. Such information may include, without limitation, the site areas visited, pages viewed, frequency and duration of visits,

STARTRADER Limited
Privacy & Security Policy

types of transactions conducted, documents downloaded and details of other websites that have referred you to STARTRADER or to which you link.

- 4.3 By opening an account with STARTRADER, placing Orders and entering into transactions, you acknowledge and agree that you will provide personal information (which may include sensitive personal data, as defined under applicable data protection and privacy laws). You hereby consent to the collection, use and processing and storage of such information by STARTRADER for the purposes of performing its obligations under this Agreement and administering the relationship between you and STARTRADER, including disclosure of such information to its Affiliates, whether located within or outside Seychelles and in any jurisdiction in which STARTRADER conducts business. Where required by applicable law, STARTRADER shall process such personal information in compliance with relevant data protection legislations, including, without limitation Data Protection Act 2023 or any equivalent legislation.
- 4.4 STARTRADER requires certain personal information in order to enter into and perform an agreement with you and to provide you with its products and services. You must provide such information as a condition of entering into an agreement with STARTRADER. Failure to do so may result in STARTRADER being unable to offer certain products or services to you. Mandatory information fields are generally identified in the relevant application forms.
- 4.5 Any correspondence or interaction between you and STARTRADER (including, without limitation, communications by email, telephone, post, SMS or via STARTRADER's website), may contain personal information, such as names and contact details. Such correspondence may include enquiries, reviews, follow-up communications, complaints lodged by or against you and any disputes involving you or your organization.
- 4.6 STARTRADER may collect and record details of telephone communications, including the phone number used to contact STARTRADER and the date, time, and duration of such calls. In the event telephone calls are recorded, STARTRADER will notify you in advance or at the commencement of the call, as required by the applicable law.

5. USE OF PERSONAL INFORMATION

- 5.1 STARTRADER may collect, retain and use your personal information where such use is necessary to comply with applicable legal or regulatory requirements, where it is required for STARTRADER's legitimate interests, or for one or more of the following purposes:-
- a) To provide the services requested by you;
 - b) To verify and confirm your identity;

STARTRADER Limited
Privacy & Security Policy

- c) To maintain and update 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 informed, while you are a customer in relation to matters such as contracts you have entered into and STARTRADER activities;
 - g) To manage and administer the products and services provided to you;
 - h) To analyze and develop an understanding of the products and services that may be of interest to you;
 - i) To provide you with information, opportunities or communications that STARTRADER reasonable believe may be relevant to you;
 - j) To tailor the website or other services provided to you based on your needs and interests; and
 - k) To create anonymized statistical data.
- 5.2 You acknowledge and consent to STARTRADER using your personal information for the purposes set out in Clause 5.1, subject at all times to applicable data protection and privacy laws..
- 5.3 Where STARTRADER uses your personal information for direct marketing purposes to inform you about products or services that may be of interest to you, you have the right at any time to opt out of receiving such communications.
- 5.4 You may exercise your right to opt out at any time by contacting STARTADER using the details provided at the beginning of this Privacy and Security Policy or by using the unsubscribe facility included in any marketing communication. If you “opt-out” of receiving marketing communications, your details will be added to STARTRADER’s suppression list to ensure you do not receive further direct marketing. Notwithstanding the foregoing, you may continue to receive administrative or operational communications that are necessary for the performance of the Agreement, provided that such communications do not include direct marketing content.
- 5.5 If you are an existing customer or where you are acting in a business capacity, STARTRADER may use your contact details, as necessary for its legitimate interests, for the purposes of marketing its products and services to you and maintaining a database of existing and prospective customers, subject to your right to opt out in accordance with this Privacy and Security Policy.
- 5.6 If you are not an existing customer, and are not acting in a business capacity, STARTRADER will only contact you for marketing purposes where you have

STARTRADER Limited
Privacy & Security Policy

provided with your prior consent, regardless of whether your contact details were collected directly from you or obtained from a third party.

- 5.7 STARTRADER will only use your personal information for the purposes for which it was collected, as set out in this Privacy and Security Policy, unless STARTRADER reasonably determines that it is necessary to use such information for another purpose that is compatible with the original purpose. Where STARTRADER is required to use your personal information for a purpose that is not compatible with the original purpose, STARTRADER will notify you in advance.

6. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 6.1 STARTRADER does not sell, license, or otherwise disclose your personal information to third parties for their own marketing purposes. STARTRADER may however, engage third party service providers to carry out our marketing activities on its behalf. In such cases, STARTRADER permits those service providers to use personal information only in accordance with STARTRADER's instructions and subject to contractual obligations requiring confidentiality and appropriate security measures.

STARTRADER may be required to disclose your personal information to the Financial Services Authority of Seychelles and, where applicable, to other regulatory, supervisory, or governmental authorities in Seychelles 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 in which STARTRADER deals with in the course of its business activities, or which are nominated by you;
- b. External service providers and/or professional advisers (including those located outside your country of residence) that provide services to STARTRADER;
- c. Any organization at your request, or any person acting on your behalf, including your financial adviser, broker, solicitor, or accountant;
- d. Any third party where such disclosure is necessary to process a transaction or provide services requested by you; or
- e. Any authority to whom STARTRADER is required to disclose such information by the applicable law.

STARTRADER Limited
Privacy & Security Policy

- 6.2 In the event that STARTRADER is involved in negotiations relating to the sale of its business (whether in whole or in part), a merger, acquisition, restructuring, or other corporate re-organisation, you agree that any personal information held by STARTRADER may be disclosed to prospective purchasers, investors, counterparties, or their professional advisers as part of any due diligence process, and may be transferred to any successor or re-organised entity or third party. Any such personal information shall continue to be used for the same purposes as set out in this Privacy and Security Policy, subject to applicable data protection and privacy laws.

7. YOUR RIGHTS

- 7.1 You are not obliged to provide any personal information requested by STARTRADER. However, where such information is required to open an account, complete an application, or provide products or services requested by you, STARTRADER may be unable to proceed without it.
- 7.2 Data protection law grants you certain rights in relation to the personal information that STARTRADER holds about you. The principal rights are summarised below. Subject to applicable legal limitations, you have the right to:
- a) **Be informed** – to receive clear, transparent and easily understandable information about how STARTRADER uses your personal information and about your rights. This Privacy and Security Policy is intended to provide such information. You may contact STARTRADER for further details at any time.
 - b) **Access** – to 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 verify that STARTRADER is lawfully processing it. STARTRADER may charge a nominal fee where permitted by law to cover the costs of verifying the request and locating, retrieving, reviewing and copying the requested information.
 - c) **Rectification** – to request the correction of any incomplete, inaccurate, or outdated personal information held about you.
 - d) **Erasure** – to request the deletion or removal of your personal information where there is no lawful basis for STARTRADER to continue processing it. This right is subject to STARTRADER’s legal and regulatory obligations, which may require continued retention in certain circumstances.

STARTRADER Limited
Privacy & Security Policy

- e) **Objection** - to object to the processing of your personal information where STARTRADER relies on legitimate interests (or those of a third party), and where your particular circumstances warrant such objection, unless STARTRADER demonstrates compelling legitimate grounds that override your rights and freedoms. You also have the absolute right to object to the processing of your personal information for direct marketing purposes..
- f) **Restriction** - to request the restriction or suspension of the processing of your personal information, for example where you contest its accuracy or the lawfulness of the processing.
- g) **Data portability** - to request the transfer of your personal information to another party where (i) you have provided the information to STARTRADER; (ii) STARTRADER is processing the information based on your consent or for the performance of a contract with you, and (iii) such processing of information is carried out by automated means.
- h) **Withdraw consent** - where STARTRADER is relying on your consent (rather than another lawful basis) to collect, process or transfer your personal information for a specific purpose, you have the right to withdraw that consent at any time. Once STARTRADER has received notification that you have withdrawn your consent, STARTRADER will cease processing your personal information for the relevant purpose, unless STARTRADER has another legitimate interest that permits continued processing.
- i) **Lodge a complaint** - if you believe that STARTRADER is processing your information in breach of data protection law, you may contact us in the first instance using the contact details provided in section 1.2 of this Privacy and Security Policy. You also have the right to lodge a complaint with your national data protection supervisory authority.

8. UPDATING YOUR INFORMATION

- 8.1 You may notify STARTRADER at any time if your personal details change, or if you wish STARTRADER to review, verify, correct, erase, or restrict the processing of your personal information, withdraw your consent, or request the transfer of a copy of your personal information to another party. Requests should be submitted by email to info@startrader.com.
- 8.2 STARTRADER will amend or delete your personal information in accordance with your instructions and applicable data protection laws, except where

STARTRADER Limited
Privacy & Security Policy

STARTRADER is required to hold your personal information for regulatory or legal compliance, to provide you with the services you have requested or to maintain adequate business records.

9. ACCESSING YOUR INFORMATION

- 9.1 Subject to the applicable data protection legislation and certain statutory exceptions, you have the right to request access to personal information that STARTRADER holds about you. This includes information about (i) the purposes for which your personal information is or will be processed, and (ii) the recipients to whom such information has been or may be disclosed. You are entitled to inform STARTRADER of any inaccuracies in your personal information.
- 9.2 If you wish to access any personal information held by STARTRADER or request the correction of inaccurate or incomplete information, please notify us in writing in accordance with the email address as stated in Clause 1.2 of this Privacy and Security Policy. STARTRADER may charge a reasonable fee for providing access to the information to cover the cost of verifying your identity and locating, retrieving, reviewing and providing the requested information, where permitted by law.
- 9.3 STARTRADER may request additional information from you to clarify the scope of your request, to verify your identity and confirm your right to access the information or to exercise any other rights. This is a necessary security measure to ensure that personal information is not disclosed to individuals who are not authorized to receive it.
- 9.4 Please ensure your request is clear before submitting it. STARTRADER will respond to your request as soon as possible and in most cases, within one month of receipt. In the event the request is complex or requires additional time, STARTRADER will inform you accordingly.
- 9.5 If the event you make a written request to clarify that your personal information held by STARTRADER is inaccurate, we will also correct, delete and/or restrict the further processing of such information, in accordance with applicable data protection laws.
- 9.6 Please note that pursuant to applicable data protection legislation, certain information may be exempt from disclosure and STARTRADER may be unable to disclose such information requested.

10. COOKIES AND WEBSITE INFORMATION

- 10.1 STARTRADER uses cookies (and other tools including but not limited to web beacons, page counters or other analytics tools) to collect information about your use of this website and other services we provide. Cookies are small data files containing a unique identifier that are placed on your device when you access our website or services. STARTRADER uses this as necessary for our legitimate interests in administering our website and to ensure it operates effectively and securely
- 10.2 STARTRADER and third-party advertisers partners, may use website information to display advertisements to you. Where advertisements are targeted, this may involve the use of website usage data and information obtained by STARTRADER or our third-party partners from other sources. This will not include information such as your name or contact details. Where your information is used for advertising purposes, it is processed as necessary for our legitimate interests in promoting our services.
- 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 automatically accept cookies. You may configure your browser settings to refuse cookies or to notify you when a cookie is being sent, allowing you to choose whether to accept it. Please note that disabling cookies may affect the functionality and performance of our services, including features related to your account.
- 10.5 Our website may, from time to time, contain links to third party websites, plug-ins and applications. By clicking on those links or enabling those connections, it may allow third parties to collect or share data about you. STARTRADER does not control these third-party websites and is not responsible for their privacy statements. We encourage you to read the Privacy and Security Policy on every website you visit.

11. CONTENT INFORMATION

- 11.1 Content information consists of information you voluntarily provide when you post content on STARTRADER's website, social media channels and any other platforms operated by STARTRADER. This may include reviews, comments, photographs, videos, and other contents.
- 11.2 STARTRADER may display, publish or otherwise use such content information on our platforms as part of its contractual relationship with you or as necessary for our legitimate interests in providing content to our users.

STARTRADER Limited
Privacy & Security Policy

- 11.3 Content information is retained for the duration of your account and may continue to be stored and displayed after account closure, unless you request its removal and such removal is required by applicable law.

12. INFORMATION COLLECTED AT OUR PREMISES

12.1 VISITOR INFORMATION

STARTRADER collects information relating to visitors to its premises. STARTRADER may record information including the date and time of your visit, the person you are visiting, your name, employer, contact details and vehicle registration number. In the event an accident occurs at our premises, this detail may also be recorded.

12.2 CCTV

STARTRADER operates CCTV systems at its premises for security and safety purposes. Clear signage is displayed in areas subject to surveillance. CCTV footage is accessed and disclosed only where required by law or as necessary in connection with disputes or investigations.

- 12.3 STARTRADER uses this information as necessary for our legitimate interests in managing visits, ensuring the safety and security of individuals, administering parking, and complying with legal and regulatory obligations.

13. STORAGE OF INFORMATION

- 13.1 STARTRADER's registered office is located in Seychelles. Our primary data servers may be located in Seychelles or other jurisdictions where STARTRADER conducts its operations or engages service providers. Where necessary to perform our contractual obligations to you, or for legitimate business purposes, your personal information may be transferred to, and stored at, a destination outside of Seychelles
- 13.2 You acknowledge and agree that your personal information may be transferred within or outside Seychelles or other jurisdictions where STARTRADER operates or is required to disclose such information. Where permitted by law, STARTRADER may disclose relevant information relating to your trading account(s) to third parties who are reasonably believed to be acting in good faith for reference, verification, regulatory, or credit assessment purposes. Such disclosures may affect your ability to obtain credit.

STARTRADER Limited
Privacy & Security Policy

- 13.3 STARTRADER transfers personal information outside of Seychelles where STARTRADER has assessed such organizations as having appropriate controls and safeguards in place to protect your personal information.
- 13.4 Some jurisdictions outside Seychelles may not provide a level of data protection equivalent to that of Seychelles. Where personal information is transferred to such jurisdictions, STARTRADER will take reasonable steps to ensure appropriate safeguards are implemented to protect your personal information, in accordance with applicable data protection laws.
- 13.5 Such transfers of personal information may be necessary for purposes related to the operation of your Account, including but not limited to: processing your instructions and transactions, maintaining internal control, operating management information systems, conducting identity, credit and compliance checks and enabling authorised personnel of STARTRADER and its Affiliates to manage and support your relationship from different locations.
- 13.6 You acknowledge and agree that, where required for the provision of our Services, we may transfer your personal information to service providers and Affiliates of STARTRADER, including those located outside of Seychelles. You hereby 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. In the event the transfer of your personal data outside of Seychelles without an adequate data protection regime, STARTRADER will ensure that appropriate safeguards are implemented..

14. DATA SECURITY

- 14.1 STARTRADER treats the security of personal information as a priority and implements best practices to protect your personal information and ensure it is not accessed by unauthorized people. These measures include encryption of data during transmission, robust authentication controls and secure access to systems, infrastructure and data.
- 14.2 STARTRADER maintains internal policies and procedures designed to safeguard personal information from accidental loss, unauthorised use or access or disclosure. Access to personal information is restricted to employees, agents, contractors, and other authorised third parties who have a legitimate business need to access it. Such people process personal information only in accordance with STARTRADER's instructions and are subject to contractual and/or statutory confidentiality obligations.
- 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, STARTRADER considers the volume, 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 the personal information is processed and whether those purposes can be achieved through other means as well as applicable legal, regulatory, accounting, and reporting requirements.
- 15.2 STARTRADER will generally retain personal information for a period of five (5) years. In certain circumstances, it may be necessary to retain personal information for longer than periods where required to fulfil the purposes for which it was collected, including compliance with legal, regulatory or reporting obligations.

Legal Claims

- 15.3 Where STARTRADER considers there to be a risk of legal proceedings, whether to initiate or defend a claim, personal information may be retained as necessary for STARTRADER's legitimate interests in establishing, exercising, or defending legal claims. In such circumstances, relevant information may also be disclosed to legal advisers or other professional advisers. The applicable retention period will depend on the nature of the claim and the period during which STARTRADER considers there to be a realistic risk of litigation STARTRADER.
- 15.4 In certain circumstances STARTRADER may anonymize your personal information so that it can no longer be associated with you. Where personal information has been anonymised, STARTRADER may retain and use such information for any lawful purpose without further notice.

16. YOUR CONSENT

- 16.1 By accessing this website or using any service provided by STARTRADER, you acknowledge that you have read and understood this Privacy and Security Policy and, where required by applicable law, you consent to STARTRADER collecting, holding, using, and disclosing your personal information, whether provided by you directly or obtained from third parties, in the manner and for the purposes described in this Privacy and Security Policy.

17. AMENDMENTS TO PRIVACY AND SECURITY POLICY

- 17.1 STARTRADER may amend this Privacy and Security Policy from time to time for operational, legal, or regulatory reasons. Any updated version of this Privacy and Security Policy will be made available on STARTRADER's website and, where appropriate, notified to you by email.
- 17.2 You are responsible for reviewing this Privacy and Security Policy periodically. Continued use of STARTRADER's website or services following the publication of any changes constitutes your acknowledgement of, and agreement to, the updated Policy.