

PRIVACY POLICY

FINALTO (BVI) LIMITED

This Privacy Policy is issued on behalf of Finalto (BVI) Limited. The information contained herein is the property of Finalto (BVI) Limited and may not be copied, used or disclosed in whole or in part outside of the Finalto Group of Companies without prior written permission. This Privacy Policy is effective from October 2025 and shall remain effective until a more recent version is released.

This Privacy Policy sets out the way in which Finalto (BVI) Limited, a company authorized and regulated by the B.V.I Financial Services Commission (“FSC”) with license number SIBA/L/14/1067 and registered address at 6th Floor Luna Tower, Waterfront Drive, Road Town, Tortola, VG1110, British Virgin Islands (“the Company”, “we”, “our” or “us”) collects, processes, stores and protects client personal 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 updated and in line with the changing environment. Any information we hold will be governed by the most recent Privacy Policy displayed on our website(s). This policy is in line with the Data Protection Act 2021, the General Data Protection Regulation (EU) 2016/679 and the UK General Data Protection Regulation.

The protection of privacy and the safeguarding of our clients’ personal information 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 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@finalto.com.

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

References to “Personal data” or “Personal information” includes any information or set of information about an individual from which that individual can be identified. Personal information does not include any information that is anonymized. We do not collect or use sensitive personal information such as information concerning race, religion or political affiliations.

Consideration of Personal Information Privacy

We are committed to being transparent about how we process 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 to provide you with the services you require. To this end, the company gathers information from you and may, in certain circumstances, 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 relevant services.

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

- **Identity Information:** first name, maiden name, last name, username or similar identifiers, passport number and other national identity document number, marital status, title, date of birth and gender.
- **Contact Information:** billing address, delivery address, email address and telephone numbers.
- **Financial Information:** bank account details, bank account statements, source of funds, source of wealth, portfolio account details and portfolio statements, payment card details.
- **Transaction Information:** details about payments to and from you and other details of products and transactions you have placed via our services and/or products.
- **Technical Information:** 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 Information:** your username and password, transactions or orders made by you, your interests, preferences, feedback and responses to our marketing campaigns or surveys.
- **Usage Information:** information about how you use our products and services.

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

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

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Directly from you: You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our products or services or create an account with us;
- Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources, as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks;
 - (c) search information providers.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources, such as Companies House or equivalent.
 - Online identity verification databases and similar service providers.

How we use your personal data

We will only use your personal data in accordance with the law. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where you provided your consent.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting the Compliance Department at compliance@finalto.com (please Appendix 1 for further details of our Compliance Department and Data Protection Officer).

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 also helps us to improve services, manage your account, review your ongoing needs, enhance 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 addresses: privacy@finalto.com or compliance@finalto.com.

We may disclose your personal information to the below parties:

- Companies within our Group, our agents, employees and representatives. The following Group companies may act as joint controllers or processors:
 - (a) Finalto Financial Services Ltd (UK)
 - (b) Finalto Trading (UK)
 - (c) Finalto A/S and Finalto Financial Services Denmark (Denmark)
 - (d) Finalto (Australia) Pty Ltd (Australia)
 - (e) Finalto Asia Pte. Ltd (Singapore)
 - (f) Finalto EU Ltd (Cyprus)
 - (g) Alpha Capital Markets Inc. (USA);
- 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 including lawyers, auditors, bankers and insurers based in the EU and UK;
- credit providers, collection agencies, courts, tribunals and regulatory authorities in accordance with our legal and regulatory obligations;
- 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 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 instructions and shall be prohibited from using your personal information for any other reason, except where legally obliged under applicable law.

We ensure you that your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data as set out in this policy.

If the data protection standard in a country is not deemed to be adequate, we do ensure that data protection is guaranteed by other measures, for example implementation of the standard contractual clauses issued by the European Commission for the protection of personal data, certificates, or recognised codes of conduct.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions in accordance with data processing agreements that we have in place and they are subject to a duty of confidentiality.

Personal Information is safely stored on secure servers and cloud services that only authorised personnel have access to, via password. The company encrypts all personal information as it is transferred to us and thus, makes all necessary efforts to prevent unauthorised parties from viewing such information. We have put in place procedures to deal with any suspected personal data breach and will notify you as well as the relevant regulator of a breach where we are legally required to do so.

Regulatory Disclosure

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

Data Retention: How long we will use your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact details, Identity, Financial and Transaction Data) for seven years after they cease being customers. The seven years retention period has been decided taking into consideration all relevant laws and regulations such as Anti-Money Laundering and Terrorist Financing as well as tax related laws and regulations. We may in certain circumstances retain your personal data for longer periods of time where we have a legitimate interest in doing so (for instance where we need to retain your personal information to enable us to defend ourselves against a claim you may have). In some circumstances you can ask us to delete your data: see *Right to request erasure* below for further information.

Your Rights

Under the Data Protection Legislation you have certain rights which are detailed below. Some of the rights stated below only apply under specific circumstances and are qualified in several respects by exemptions provided by the Data Protection Legislation.

- **Right of access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to rectification.** You have the right to request rectification or correction of the personal data that we hold about you which is incorrect. We may need to verify the accuracy of the new data you provide to us.
- **Right to request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no compelling reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that the right to request erasure of your data is not an absolute right therefore and we may not always be able to comply with your request of erasure for specific legal reasons (for instance we may be required to retain your data as described in section “Data Retention”).
- **Right to object to processing** of your personal data which is processed on the basis of our legitimate interests. However, we may continue to process your Personal Data, despite your objection, where there are compelling legitimate grounds to do so or we need to process your Personal Data in connection with any legal claims.
- **Right to request restriction of processing** of your personal data in certain circumstances. Where we suspend our processing of your Personal Data we will still be permitted to store your Personal Data, but any other processing of this information will require your consent, subject to certain exemptions.
- **Right to data portability.** This right allows you to obtain your Personal Data that you have provided to us with your consent or which was necessary for us to provide you with our products and services in a format which enables you to transfer that Personal Data to another organisation. You may have the right to have your Personal Data transferred by us directly to the other organisation, if this is technically feasible. Please note that this right only applies (a) to personal information you have provided to us, (b) where processing is based on your consent or the performance of a contract or (c) when processing is carried out by automated means.
- **Right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time of your request. To opt out from email marketing you can use the unsubscribe link provided in the marketing communication you receive from us. If you wish to unsubscribe from marketing communications you may contact us at privacy@finalto.com or contact the Onboarding team at onboarding@finalto.com.
- **Rights relating to automated decision making and profiling:** You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or has some other significant effect on you. In such cases you have a right to request human intervention or contest the decision taken solely by automated means. We may use profiling and automation to assist with the identification of potential cases of financial crime, where this is necessary for entering into or performing a contract, to fulfill our legal and regulatory obligations, in cases where we have obtained your consent or where this is authorized by applicable law.
- **Right to lodge a complaint** with the Data Protection Authority of your jurisdiction. You may find the relevant Data Protection Authority within EU here https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

If you wish to exercise any of the rights set out above or have any questions, please contact the us at privacy@finalto.com. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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 web site 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.

Opting Out

As mentioned above you have a right to withdraw your consent at any time. You can ask us to stop sending you marketing communication at any time by emailing us to one of the following email addresses: onboarding@finalto.com, compliance@finalto.com or privacy@finalto.com. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service, warranty registration, product/service experience or other transactions. Please note you will always have the ability to opt out by unsubscribing from communications via the relevant links that are included in the communications that might be sent to you.

Statistical Information and Cookies

We may collect information about your use of the Website using “cookies”, pixel tags and similar functionality. A “cookie” is a small file of text which is downloaded onto your computer when you access the Website, and it allows us to recognize when you come back to the Website. We use cookies for the operation of this website. For these purposes, Cookies are placed on your device to identify you in the future when you visit our website or connect with any of our applications. For additional information about the cookies we use please see our Cookie Policy.

The cookies used on this Website are either set by us or by our third-party service providers, and fall into the following categories:

- **Strictly Necessary** – these cookies are essential in order to enable you to move around the Website and use its features. If you remove or disable these Cookies, we cannot guarantee that you will be able to use our Website or benefit from all our security features.
- **Performance** – these Cookies collect information about how visitors use our Website. They allow us to recognise and count the number of visitors and to see how visitors move around our Website.
- **Functionality** – these Cookies are used to provide services or to remember choices you make so we can personalise our content for you. We use this information to customise your experience of our Website to meet your preferences for content layout, text size etc. You can manage these Cookies using your browser settings. However, if you block them we may not be able to offer you certain services that you have chosen
- **Targeting** – these Cookies record the fact that you have visited our Website, including which web pages you have accessed, which device you have accessed them from, and which links you have followed. We use this information to make our Website relevant to your interests and for fraud and website abuse detection purposes, including detecting players who have abused bonus schemes or other promotions.

The company may share website usage statistics with reputable advertising companies and with its marketing companies. The information collected by the advertising company does not contain any personal identifiable information.

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

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@finalto.com.