



**STARTRADER LIMITED
(FORMERLY IV MARKETS
LIMITED)**

Privacy Policy

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PRIVACY POLICY

STARTRADER LIMITED (Formerly IV Markets Limited) (the “Company”) is a Seychelles’ Securities Dealer authorised by the Financial Service Authority (FSA) with SDL Licence number 049.

The Company is committed to protecting individuals’ personal data in line with the requirements of applicable law.

The Company’s commitment applies to all individuals whose personal data it may process.

“Personal Data” means any information relating to an identified or identifiable natural person. The Company acts as a controller in relation to such personal data.

This Privacy Policy or Notice describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

We may make changes to this Notice from time to time and it is important that you check this Notice for any updates. Any personal information we hold will be governed by our most current privacy notice. If we make important changes to this Notice, we will communicate them to you.

Please note that this notice is addressed to customers and potential customers.

1. Personal Data that we may collect:

When you create an account with the Company, we require you to provide your first and last name, e-mail address, details about your financial status, your residential address, phone number, date of birth, a copy of your national identity card or passport or driving licence, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address, profession and employment details, knowledge and experience in trading, risk tolerance and risk profile and other information we may consider necessary to our functions and activities and in order to be in a position and be permitted to provide our services to you, and to fulfil our obligations set out by AML legislation.

If the Company requests you to provide personal data and you fail to do so the Company may not be in a position to provide a service and/or enter into an agreement with you, in which case it will inform you accordingly.

The abovementioned data are collected by the Company when you are going to open a trading account with the Company. It is required by the ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM ACT 2020, that the Company collects the necessary data for verifying your identity, constructing your economic profile, monitoring your account and verifying the source of funds (when it is necessary). Additionally, we use this data to set up and administer your trading account, and provide technical and customer support.

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our Website.

When you visit the website, we may collect the following data:

- Your IP address.
- Your contact information and email address.
- Other information such as interests and preferences.
- Data profile regarding your online behaviour on our website.

If you are a corporate client, we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary in order to be compliant with our legal and regulatory requirements. In addition, we also request the corporate client to provide the latest financial statement or bank statement of last 6 months where applicable.

We shall record any communications, electronic, by the message on our portal, by email, by telephone or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. It should be noted that we shall keep records of all telephone conversations and electronic communications that are related to transactions concluded or intended to result in transactions when dealing on own account and the provision of client order services that relate to the reception, transmission and execution of client orders, for Seven Years.

2. Legal Ground for personal Data processing:

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

The Lawful Basis are the following:

- to perform our contractual obligations towards you
- to be compliant with applicable legal and regulatory requirements

We follow the following three steps to pursue our legitimate interests:

- Identify the legitimate interest
- Show that the processing is necessary to achieve it
- Balance it against the individuals' interests' rights and freedoms.

Where our use of your personal information does not fall under one of the above-mentioned Lawful Bases we will require you to provide your consent. Such consent shall be freely given by you and you will 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.

3. How we use your personal data:

Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

- (a) where required by law or a court order by a competent Court.
- (b) where requested by FSA or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients.
- (c) to government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- (d) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- (e) where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority;

- (f) to such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services;
- (g) to payment service providers and banks/credit institutions processing your transactions;
- (h) to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- (i) only to the extent required and only the contact details to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement.
- (j) only to the extent required, to other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form.
- (k) only to the extent required, to market research call centres that provide telephone or email surveys with the purpose to improve the services of the Company, in such a case only the contact details will be provided.
- (l) where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority.
- (m) to anyone authorised by you.
- (n) to an Affiliate or introducing broker of the Company.
- (o) to any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or other relevant agreements.
- (p) to successors or assignees or transferees or buyers, with fifteen (15) Business Days prior Written Notice to the Client; this will happen in the event that the Company decides to sell, transfer, assign or novate to a third party any or all of its rights, benefits or obligations under the Agreement with you or the performance of the entire Agreement subject to providing fifteen (15) Business Days Prior Written Notice to the Client. This may be done without limitation in the event of merger or acquisition of the Company with a third party, reorganisation of the Company,

winding up of the Company or sale or transfer of all or part of the business or the assets of the Company to a third party.

4. Client Information is disclosed in relation to US taxpayers to the Seychelles Revenue Commission in Seychelles, which will in turn report this information to the IRS of the US according to the Foreign Account Tax Compliance Act (FATCA) of the USA.

The Company takes the appropriate measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

The Company implements appropriate technical and organisational measures such as data encryption, access management procedure, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy etc. Additionally, the Company limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's personal data on the Company's instructions and they are subject to a duty of confidentiality.

Your personal data may be stored electronically or in paper form.

5. Automated decision – making and Profiling

In order to perform the contract between us and as required by the Securities Act 2007, as a securities dealer regulated by the FSA, it is requested for the provision of the securities services to you, to assess your knowledge and experience, your financial situation and investment objectives.

We will fulfil the above requirements through the following tools:

Onboarding Questionnaire: these take place when you require registering as a client of the Company. Hence, we need to check and ensure that you fall within the Company's positive target market and that the Company's services and products are appropriate, taking into consideration your categorisation, knowledge, financial background and experience in regards to financial services. Based on the results, you will be informed whether you are eligible to receive our services and become our Client. The reason for assessing you is to enable the Company to offer you services suitable to you and act in your best interests.

The results above are monitored by the back office of the Company. During these processes, the Company takes all the technical and operational measures to correct inaccuracies and minimise the risk of errors, to prevent any discrimination and to secure the personal data of the client.

6. How we treat your personal data for marketing activities and whether profiling is used for such activities

We may process your personal data to inform you about products, services and offers that may be of interest to you or your business.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services. This information helps the Company to improve its services, customise the browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting the company through this specific email ID: **support@ivmarkets.com**

7. How long we store your personal data for

We will only retain your personal data for as long as we reasonably require it for legal or business purposes subject to a maximum of seven years. In determining data retention periods, we take into account local laws, contractual obligations and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it.

For example, we are subject to the Securities Act 2007 and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of income and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of Seven years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

8. Your rights as a data subject

Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.

Right of rectification – you have a right to request from us to correct the personal data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation under Seychelles law), the Company acting as your controller will erase your personal data from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply, the Company will transfer your personal data to another organisation.

Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent 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 withdraw 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 you withdraw your consent.

In respect to the aforementioned rights, we will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data. You can send the relevant request to the following e-mail address:

support@ivmarkets.com

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

9. Restriction of responsibility

The Company is not responsible for the privacy policies or the content of sites to which the Company's website links and has no control of the use or protection of information provided by the clients or collected by those sites.

The Company shall not be liable for information provided by the client to any linked websites which are not operated by the Company. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

10. Contacting us about this Policy or making a complaint

If you have any queries about the contents of this Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Complaint Handling Unit & Requests

E-mail: support@ivmarkets.com

We will promptly respond to your requests, but depending on the complexity or number of requests. We aim to resolve the complaints within fourteen (14) business days. In case your requests and or complaints take us longer than fourteen (14) business days., we will notify you accordingly and keep you updated.

If you are not satisfied with our response to your complaint and/or your request, you have the right to lodge a complaint with our supervisory authority, the Financial Services Authority. The contact of FSA is as follows:

Address

Financial Services Authority

PO Box 991

Bois De Rose Avenue

Victoria

Mahe

Seychelles

Telephone: +248 4380800

Email: complaints@fsaseychelles.sc