



### **What Is This Policy About**

Strathos Capital Technology LLC ("Strathos") Company Number 713LLC2020 has been duly incorporated under the laws of SVG with its registered address at Suite 305, Beachmont, Kingstown, SVG.

Strathos recognizes the importance of your privacy and understands your concerns about the security of your personal information. We are committed to ensuring that when you share information with us or we collect information about those who visit our websites, we do so in accordance with applicable privacy laws.

This Privacy Policy details how we generally collect, hold, use and disclose personal information and your rights in relation to the personal information that we hold about you.

### **YOUR CONSENT**

By providing us with information about yourself through any of our websites, application forms, via telephone or otherwise, you consent to the collection, use, disclosure and transfer of that information as set out in this Privacy Policy. By using our website you also consent to our use of cookies as set out in this Privacy Policy.

If you apply to open a trading account, your application form (whether written or electronic, or in any other form (including verbal) will constitute your express consent to the use and (in certain circumstances) disclosure of your personal information.

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

### **THE INFORMATION ABOUT YOU WHICH WE COLLECT**

The products and services we provide fall under the scope of our regulated activities and as such we generally have obligations to ask for a range of personal information from you which could include your name, address, date of birth, gender, contact details, occupation, income, assets and liabilities, bank account details, trading history or statements, financial statements, credit reporting information, employment details, location data or any other similar information which could be used to identify you.

### **HOW WE COLLECT THAT INFORMATION**

We obtain most of the information directly from you through application forms or telephone conversations, and from maintaining records of information obtained in the course of ongoing customer service. We may also obtain information from other sources, such as via identity checks.

We may also obtain information about you through your use of our websites, apps or through the use of cookies on our websites.

Sometimes we may ask for other information voluntarily (including through market research, surveys or special offers) so that we can improve our service or better cater to the wider needs of our current and future clients.

We may record communications that we have with you in relation to the services we provide to you and our relationship with you. These recordings may be in electronic format, by telephone, in person or otherwise and will be our sole property, constituting evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or other notice.

If you choose not to provide the information we request, we may not be able to provide you with the product or service you need, or open your trading account.

### **THE SECURITY AND STORAGE OF YOUR INFORMATION**

We take our obligations to protect your personal information very seriously and as such we take reasonable steps to hold information securely in electronic or physical form. These steps are supported by a number of security

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standards, processes and procedures, and we store information in access-controlled premises or in electronic databases requiring logins and passwords.

The transmission of information via the Internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services and any transmission is at your own risk.

To try to prevent this, we use Transport Layer Security (TLS) encryption technology in order to protect the information that you submit to us. This type of technology is designed to protect you from having your information intercepted by anyone other than Strathos during its transmission. We also use other safeguards such as firewalls, authentication systems (e.g., passwords and personal identification numbers) and access control mechanisms to restrict unauthorised access to systems and data.

Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

We use a combination of secure computer storage facilities and paper-based files and other records and, irrespective of the format of the information, take steps to protect the personal information we hold from interference, misuse, loss, unauthorised access, modification or unauthorised disclosure.

Some electronic communications through non-secure web platforms may not be secure, virus-free or successfully delivered. If you communicate with us using a non-secure web platforms, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

You can help us to keep your information secure. Remember that any user name or password in relation to our websites is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

#### **WHAT HAPPENS IF WE MAKE CHANGES TO THIS POLICY?**

If we change this Privacy Policy we will post the changes on this website, may place notices on other pages of this website, or may include notification of such changes in email communications so that you may at all times be aware of any changes to the information we collect and how we use it. The changes will take effect as soon as they are posted on our websites or you are notified in some other way (whichever occurs first).

#### **COOKIES**

We use cookies to monitor your use of our websites to observe behaviour, compile aggregate data and provide you with a more effective service. Cookies are small files containing information that websites all over the world use to track its visitors. We may set and access Strathos cookies on your computer, enabling us to learn which advertisements and promotions bring users to our website. Strathos or any of its affiliates or divisions may use such cookies and the captured data helps us enhance the services offered and to make improvements in relation to the quality of content contained on our websites so that it is more relevant to you.

#### **HYPERLINKS**

Our websites may contain hyperlinks that link to other sites, and other sites may contain links to our sites. These websites that may be linking to or from our sites may have their own privacy policies. Strathos' Privacy Policy applies exclusively to us and information collected by us. We are not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you realise this information is going to a third-party. Because of this, you should become familiar with that site's privacy policy and how information you share with that site will be treated.

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#### **ACCESSING YOUR PERSONAL INFORMATION**

You have the right to request a copy of the personal information about you which we hold in order to correct any inaccuracies and to object to our using your personal information for a marketing purpose. To do this, you should contact us using the details set out below in the "How to Contact Us" section. There is no fee for requesting that your personal information is corrected, however in processing your request, our reasonable costs may be recovered if necessary and if relevant legislation allows. This covers such things as locating the information and supplying it to you. Where we refuse to action your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

#### **UPDATING INFORMATION ABOUT YOU**

If any of the information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, please let us know by contacting us as set out below.