



PRIVACY POLICY

Introduction

We need to collect personal information from our customers and prospective customers as part of our daily business operations in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services and when providing them with the relevant information.

Your privacy is of utmost importance to us and it is our policy to protect and respect the privacy of individuals and the confidentiality of information. This Privacy Policy sets out how Hextra Prime collects, uses and manages your personal information that we receive from you or a third party with our provision of services to you or that we collect from your use of our services and/or our website and/or any other related websites and apps, including but not limited to those of the Company. In addition, the Privacy Policy informs you of your rights as regards the processing of your personal information.

Our Privacy Policy is regularly reviewed to ensure that any new obligations and technologies, changes to our business operations and practices are taken into account, as well as that the changing regulatory environment remains in line. Our most recent Privacy Policy will regulate any personal information we retain.

Please note that your personal information will be used in connection with your employment contract or your contractual relationship if you are an existing and/or former employee of the Company, a job applicant, a contractor to the Company or a third party service provider.

This Privacy Policy applies to Hextra Prime's processing activities for the personal data of its customers / potential customers, website visitors and employees. This Privacy Policy does not apply to websites operated by third parties and/or by any other organizations.

Who we are

Hextra Prime is a Securities Provider Licensee regulated and authorized by the Financial Services Authority in Saint Vincent & the Grenadines under the License Number: 25989 BC 2020 (hereinafter called the "Company").

Safeguarding the privacy of your personal data and protecting your privacy

The Company respects the privacy of all users who access its website(s) and is therefore committed to taking all reasonable steps to safeguard any customers, applicants and website visitors who are existing or prospective. The Company keeps personal data of any customer / potential customers in accordance with the applicable laws and regulations on data protection.

To ensure that your information remains protected at all times, we have the necessary and appropriate technical and organizational measures and procedures in place. We regularly educate and raise awareness of the importance of maintaining, protecting and respecting your personal information and privacy for all of our employees. We consider breaches of the privacy of individuals very seriously and will impose suitable disciplinary measures, including dismissal if necessary. When you register as a user of the Company's website(s) and/or services, the personal information you provide us with is classified as registered information that is protected in several different ways.

After logging in to the Client's Cabinet, you can access your registered information by entering username and a password that you select. It is your responsibility to ensure that only you are aware of your password and not disclosed to anyone else. Registered information is securely stored in a secure location and is accessible via username and a password to only authorized personnel. All personal information is

transferred over a secure 128-bit SSL connexion to the Company and all necessary measures are therefore taken to prevent any unauthorized parties from viewing such information.

Personal information provided to a company that is not classified as registered information shall also be kept in a secure place and shall be accessible only by username and password to authorized personnel. The transmission of information over the internet is not always completely secure, but by taking serious precautions, the company strives to protect your personal data. We will apply procedures and security features once we have received your information to attempt to prevent unauthorized access.

Personal data which we collect

In order to open an account with us, you must first complete the application form and submit it to us by filling out the information required. You are asked to disclose personal information by completing this application form in order to allow the Company to evaluate your application and comply with the relevant rules and regulations. In order to inform you about its services, the company may also use the information you provide.

The information that we may collect from you includes the following:

- Full name, address of residence and contact details (e.g. email address, telephone number, fax, etc.);
- Date of birth, birthplace, gender, citizenship;
- Information about your income and assets, including information about your fund and source, assets and liabilities, bank account details, trading statements, information on financial statements;
- Trading account balances, trading operations, your inquiries and our answers;
- Data on whether you hold a significant public function;
- Details of profession and employment;
- Data for authentication (e.g., signature)
- Data on location;
- Trading results, expertise and experience
- Verification information that includes information necessary for verifying your identity, such as a passport or driver's license (examples also include background information that we receive about you from public records or from other entities that are not affiliated with us); we may also collect other identifiable information, such as identification numbers and/or registration numbers for passport / tax;
- Any other data commonly used to identify you and your trading experience that is relevant to us providing you with our services.

Through your use of our services, including through any of our websites , apps, account opening applications, our demo sign-up forms, webinar sign-up forms, subscribing to news updates and from information provided during ongoing customer service communications, we obtain this information in a number of ways. This information about you may also be collected by us from third parties, such as through publicly available sources. We also keep records of your conduct in trading, including records of the following:

- Products that you trade and their performance with us;
- Historical data, including the amount invested, of the trades and investments you have made;
- Your preference for certain kinds of services and products.

From time to time (for example, through market research or surveys), we may voluntarily ask for other personal information. We may not be able to provide you with the requested product or service if you choose not to provide the information that we need to fulfill your request for a specific product or service.

In relation to the services we provide to you and our business relationship with you, we may record any communications, electronic, telephone, in person or otherwise, we have with you. Such recordings will be our sole property and will be proof of the interactions between us. It is possible to record such telephone conversations without the use of a warning tone or any other further notice. In addition, we may have CCTV that will record your image if you visit any of our offices or premises.

If we receive personal information about an individual that is unsolicited by us and not necessary for the provision of our services, we will destroy the information securely (provided that it is lawful and reasonable for us to do so).

Applicants for the job

Personal information is stored in staff files or within the company's human resources systems. We have a separate employee non-disclosure agreement for employees that will be given to you upon recruitment. The following types of data may be held by the Company, as appropriate, on the relevant individuals:

- Name, address, phone numbers, date of birth, gender, marital status, email address, etc.;
- CVs and other data collected during hiring;
- Former employers' references;
- Numbers of National Insurance;
- Information about criminal convictions;
- Job title, work descriptions and grades of pay;
- Conducting issues such as disciplinary proceedings and letters of concern;
- Information on internal performance;
- History / information on medical or health;
- Codes of taxation;
- Employment terms and conditions;
- Details of training.

As we may find necessary for the purpose of recruitment, we may also request other personal information. In the event of other appropriate job vacancies occurring in the company for which we believe you may wish to apply, we will seek your consent to retain your data if you are unsuccessful in obtaining employment. You are free to withhold your consent to this and withholding consent will have no consequences.

Lawful basis for the processing and purposes of your personal information

Your personal data may be processed for the following reasons and for the following purposes:

1. Execution of a contract

In order to provide our services and products, we process personal data, as well as information about our products and services based on the contractual relationship with our customers (i.e. in order to perform our contractual obligations). In addition, personal data processing takes place in order to be able to complete on-boarding / acceptance procedures for our customers.

In view of the above, in order to accept you as our customer, we need to verify your identity and we will need to use those details to manage your trading account with us efficiently to ensure that you get the best service from us. This may include, on our behalf, third parties carrying out credit or identity checks. For us to know who you are, the use of your personal information is necessary as we have a legal obligation to comply with certain regulatory obligations of Know Your Customer and Customer Due Diligence.

2. Fulfillment of a legal obligation

As well as statutory requirements (e.g., anti-money laundering laws, financial services laws, corporate laws, privacy laws and tax laws), there are a number of legal obligations arising from the relevant laws to which we are subject. There are also different supervisory authorities (e.g. the SVG FSA) whose laws and regulations we are subject to. For credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls, such obligations and requirements impose upon us the necessary personal data processing activities.

These obligations, including customer boarding / acceptance, payments and systemic risk management checks, apply at various times.

3. For the purpose of the protection of legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or a third party. A legitimate interest is when we have a business or commercial reason for using your information. In spite of that, it must not go unfairly against what is right and best for you. Examples of such processing activities include the following:

- Initiating legal claims in litigation procedures and preparing our defense;
- Means and procedures that we undertake to ensure the IT and system security of the company, preventing potential crime, security of assets, admission controls and anti-intrusion measures;
- Installation of CCTV systems (e.g. for safety reasons at our premises);
- Business management measures and the further development of products and services;
- Sharing your personal data within the Hextra Prime with a view to updating / verifying your personal data in accordance with the relevant compliance framework for anti-money laundering;
- Risk Administration.

4. You have given your consent to

Our storage and use of your personal data is based on your consent (if your consent is not required, other than for the reasons described or implied in this policy). You may withdraw your consent at any time, but any processing of personal data before your withdrawal is received will not be affected.

5. Assessing the suitability of our services / products for customers

6. Providing you with products and services, or with information about our products and services, and reviewing your ongoing needs

Once you have successfully opened a trading account or subscribed to an update or webinar with us, we will need to use your personal information to carry out our services and fulfil our obligations to you. It is also in our legitimate interest to ensure that we provide the best products and services, so we can review your needs periodically to ensure that we benefit from the best possible products and services.

7. To help us improve our products and services and to develop and market new products and services, including customer services.

We may use personal information provided by you from time to time through your use of the facilities and/or through customer surveys to help us improve our products and services. In order to ensure the highest standards when providing you with our products and services, it is in our legitimate interests to use your personal information in this way and to remain a market leader in the financial services industry.

8. For a profile about you to form

We may use personal information provided by you from time to time through your use of the facilities and/or through customer surveys to help us improve our products and services. In order to try to ensure the highest standards when providing you with our products and services, it is in our legitimate interests to use your personal information in this way and to continue to be a market leader in the financial services industry.

9. To examine or resolve inquiries or disputes

In order to investigate issues and/or resolve disputes with you, we may need to use personal information collected from you as it is in our legitimate interests to ensure that problems and/or disputes are investigated and resolved in a timely and effective manner.

10. To comply with applicable laws, orders of court, other judicial proceedings or requirements of any applicable regulatory authority

To comply with any applicable laws and regulations, court orders or other judicial process, or the requirements of any applicable regulatory authority, we may need to use your personal information. Not only do we do this to fulfill our legal obligations, but also because it may be in our legitimate interest to do so.

11. To send surveys to you

We may send surveys to you from time to time as part of our customer feedback process. To try to ensure that we provide our services and products to the highest standards, it is in our legitimate interest to ask for such feedback. We may, however, also ask you to participate in other surveys from time to time, and if you agree to participate in other surveys, we rely on your consent to use the personal data we collect as part of that survey. All responses to any survey

that we send out will be aggregated and depersonalized before the survey results are shared with any third parties, whether for customer feedback or otherwise.

12. Analyzing Data

Our website pages and e-mails may contain web beacons or pixel tags or any other similar type of tools for data analysis that enable us to monitor the receipt of correspondence and count the number of users who have visited or opened our correspondence on our website. Why can your personal information (such as trading history) be aggregated on an anonymous basis (i.e. with your personal identifiers removed) with the personal information of our other customers so that more rigorous statistical analysis of general patterns can lead us to provide better products and services.

We do not require a legal basis if your personal information is completely anonymity, as the information will no longer constitute personal information. If your personal information is not in an anonymity form, it is in our legitimate interest, in order to ensure that the products and services we provide are relevant to the market, to continually evaluate that personal information.

13. Purposes for marketing

To ensure that you are always kept up to date with our latest products and services, we may process your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns). We will either do so on the basis of your consent, or if it is in our legitimate interest, if we send you marketing communications.

We will not disclose your information to any outside parties in order to enable them to market it to you directly.

14. Internal business purposes and keeping of records

For internal business and research purposes, as well as for record keeping purposes, we may need to process your personal information. In order to comply with our legal obligations, such processing is in our own legitimate interests and is required. In relation to the services and products we provide to you and our relationship with you, this may include any communications we have with you. We will also keep records to ensure that, according to the agreement governing our relationship with you, you comply with your contractual obligations.

15. Legal announcements

The law often requires us to advise you about certain modifications to goods or services or laws. We may need to let you know about changes to the terms or characteristics of our products or services. To send you these legal notifications, we need to process your personal information. Even if you choose not to receive direct marketing information from us, you will continue receiving this information from us.

16. Restructuring of corporations

We may need to use your personal information in connection with that re-structuring or acquisition if we undergo a corporate re-structuring or part of it, or if all of our business is acquired by a third party. Such use may include the sharing of your data in accordance with legal agreements as part of due diligence inquiries or disclosures. It is our legitimate interest, if we comply with any legal / regulatory obligation we have towards you, to use your information in this way.

17. Physical Safety

We may record your image on our CCTV for security purposes if you enter any of our premises. We may also take your details to maintain a record of who on any given day has entered our premises. To maintain a safe and secure working environment, it is in our legitimate interest to do this.

Your Personal Information Disclosure

The Company shall not disclose to a third party any of its customers' confidential information, except: (a) to the extent that it is required to do so in accordance with any applicable laws, regulations and/or regulations.

- (b) where there is a public duty to disclose;
- (c) if disclosure is required for our legitimate business interests; or
- (d) to the persons described in this policy at your request or with your consent.

Unless otherwise instructed by a regulatory authority, the Company will endeavor to make such disclosures on a 'need-to-know' basis. The Company shall, in such circumstances, notify the third party of the confidentiality of any such information.

The Company may disclose your personal information to the following persons as part of the use of your personal data for the purposes set out above:

- Any member of the Hextra Prime, which means that such information may be received by any of our ultimate holding companies and their respective subsidiaries;
- Our associates and service providers, including third parties, for business purposes, such as business service providers and specialist consultants, who are contracted to provide us with administrative, financial, legal, tax, enforcement, insurance, research or other services;
- The Introducers of businesses with whom we have a mutual business relationship;
- As agreed or authorized by law, business parties, providers of credit, courts, tribunals and regulatory authorities;
- Payment service providers (PSPs) and/or banking institutions with regard to issues raised with the Company regarding deposits / withdrawals to / from the trading account(s) held with the Company and/or for the purpose of initiating an investigation into such matters (e.g. deposits by third parties);
- Any person authorized by you.

If the Company discloses your personal information to business parties in order to perform the services requested by customers, such third parties may store your information in order to comply with their legal and other obligations, e.g. card processing companies or banks.

In general, organizations outside the Hextra Prime that handle or obtain personal information are required to recognize the confidentiality of this information, to respect the right of any individual to privacy and to comply with all applicable data protection laws and this Privacy Policy. Third-party service providers such as credit referencing agencies may keep a record of any searches conducted on our behalf (if and where applicable) and may use the search details to assist other companies in carrying out their searches.

Please note that the use of your personal information is not covered by this Privacy Policy and is not subject to our Privacy Standards and Procedures by external third parties acting as data controllers of your personal information. Customers acknowledge and agree that, from time to time, the Company may analyze the data collected when visiting our website(s) or by other means, such as questionnaires, for statistical purposes in order to improve the business activities of the Company.

Data gathered from your use of our services

In order to optimize the services provided to customers / potential clients, tracking systems used on the company's website(s) may collect your personal data. The website gathers data in the following ways:

- Information on devices

We can provide you with the most appropriate version of our website(s) by recognizing the device used to access and use the company's website(s).

- Log Information Log Info

Logging certain behaviors on the site allows the company to monitor user activity and thus troubleshoot any problems that may arise.

- Information on location

Using your IP address enables us to locate the content of our website that we provide to you based on your country and to enhance your user experience on our website(s).

- Cookies

Cookies are text files with a small amount of data sent to your browser from our website(s) and stored on the hard drive of your computer. Cookies allow us to enhance the performance of our website(s) and the experience of visitors to our website, monitor your referrer and enhance our future advertising campaigns.

- Local storage

To activate your trading account, you must submit validation documents to us through the Company's Client's Cabinet. These documents are transmitted and stored in a safe location over a secure 128-bit SSL connection.

Cookies

Internet cookies are small pieces of data sent to your browser from our website(s) and stored on the hard drive of your computer when you use our website(s), and may include a unique identification number. The purpose of collecting this information is to provide you with a more relevant and efficient experience, including the presentation of our web pages according to your needs or preferences, on our website(s).

Cookies are often used on many websites on the internet, and by changing your preferences and options in your browser, you can choose whether and how to accept a cookie. If you choose to disable the acceptance of cookies in your browser, especially in the Company Client's Cabinet and other secure parts of our website(s), you may not be able to access certain parts of our website(s). In order to benefit from all our online services, we therefore recommend that you allow cookie acceptance.

In addition, to allow us to reach out to users who have previously visited our website(s) and have shown an interest in our products and services, we use cookies for re-marketing features. Periodically, based on

your previous use of our website(s), we may use third party vendors, such as Google and AdRoll, to display our advertisements over the internet to you. You can opt out of this specific use of cookies at any time by visiting the Google Ads Settings page and the opt-out page of Double Click, or by updating those services later.

The Company utilizes cookies for session ID and persistent cookies. A cookie with a session ID expires after a set period of time or when the browser window is closed. For an extended time period, a persistent cookie remains on your hard drive. You can delete persistent cookies by following the instructions provided in the 'Help' file for your web browser.

Read our Cookies Policy for further details about our cookie policy and how our cookies work.

How We Get Your Consent

Where your consent is required for our use of your personal information, such consent will be given in accordance with the express written terms governing our business relationship (which are available from time to time on our website(s) as amended).

You have the right to withdraw your consent at any time by contacting us using the contact details set out in this Privacy Policy if we rely on your consent as our legal basis for the retention and processing of your personal information.

Storage of your personal data and period of retention

It is of utmost importance to us to safeguard the privacy of your information, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will keep personal information in a combination of secure computer storage facilities and paper-based files and other records for as long as we have a business relationship with you, and we will take the measures necessary to protect the personal information we hold from misuse, loss, unauthorized access, alteration or disclosure.

We will remove any information that will identify you or we will safely destroy the records if we consider that personal information is no longer necessary for the purpose for which it was collected. However, for a significant period of time, we may need to maintain records. For example, for a period of five (5) years after our business relationship with you has ended, we are subject to some anti-money laundering laws that require us to retain the following:

- A copy of the documents we used to fulfill our due diligence obligations to our customers;
- Evidence and records of transactions with you and your relationship with us are supported.

The personal information we hold in the form of a registered communication will also be kept in line with local regulatory requirements (i.e. 5 years after our business relationship with you has ended or longer if you have legitimate interests (such as dealing with a dispute with you) by telephone, electronically, in person or otherwise. If you have opted out of receiving marketing communications, we will keep your details on our removal list so that we know that you do not want these communications to be received.

We may keep your data for longer than 5 years if, for legal, regulatory or technical reasons, we are unable to delete it.

Your rights with respect to your personal details

The rights that may be available to you are set out below in relation to the personal information we hold about you.

Data and Access to

If you ask us, we will confirm, within thirty (30) days from the date of your request, whether we are processing your personal information and, if so, what information we are processing and, if requested, provide you with a copy of that personal information (along with certain other details). We may need to charge a reasonable administration fee if you require additional copies.

Rectifying

For us, it is important that your personal data is up-to-date. To ensure that your personal information stays accurate, complete and up-to-date, we will take all reasonable steps. You have the right to have it rectified if the personal information we hold about you is inaccurate or incomplete. If we have disclosed your personal data to others, we will, where possible, let them know about the correction. If you ask us to do so, we will also inform you, if possible and legally, who we have shared your personal information with, so that you can contact them directly.

By sending us an e-mail at support@hextraprime.com, you may inform us at any time that your personal details have changed. In accordance with your instructions, the Company will alter your personal information. In some cases, we may need supporting documents from you as evidence, i.e. personal information that we are required to keep for regulatory or legal purposes, to proceed with such requests.

Erasure Up

In certain circumstances, you may ask us to delete or delete your personal information, such as if we no longer need it, or if you withdraw your consent (if applicable), provided that we do not have a legal obligation to retain that information. This request will be subject to any retention limits that we are required to comply with in accordance with applicable laws and regulations and subject to the 'Storage and Retention Period' section of your personal information. If we have disclosed to others your personal information, we will let them know where possible about the erasure. If you ask us to do so where it is possible and lawful, we will also inform you with whom we have shared your personal information, so that you can contact them directly.

Constraints on processing

In certain circumstances, you may ask us to 'block' or suppress the processing of your personal data, such as if you contest the accuracy of that personal information or object to the processing of it by us. It will not stop your personal information from being stored by us. Before we choose not to agree with any requested restriction, we will inform you. If we have disclosed your personal information to others, if possible, we will notify them of the restriction. If you ask us to do so, if possible and legally, we will also inform you with whom we have shared your personal information, so that you can contact them directly.

Portability of Data

Under the General Data Protection Regulation, you have the right to obtain, in certain circumstances, personal information that you have provided to us (in a structured, commonly used and machine-readable format) and to re-use it elsewhere or to ask us to transfer it to a third party of your choice.

Objection Rejection

You can ask us to stop the processing of your personal data, and we will, if we are:

- To rely on the legitimate interests of our own or someone else to process your personal information unless we can demonstrate compelling legal grounds for the processing;

- Processing for direct marketing your personal information; or
- Unless we reasonably believe that such processing is necessary or prudent for the performance of a task carried out in the public interest (such as by a regulatory or enforcement agency), the processing of your personal information for research is required.

Automated profiling and decision-making

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has a further significant impact on you, you may request that you not be subject to such a decision unless we can demonstrate to you that such a decision is necessary for you to enter into, or to execute, a contract with us. Even if a decision is necessary for a contract to be entered into or executed, you may challenge the decision and require human intervention. If we agree to such a request (i.e. terminate our relationship with you), we may not be able to offer our services or products to you.

Choice to opt-out from gathering your personal data

You must inform the company by sending an email to support@hextraprime.com if you do not want us to use your personal information. We may not be able to continue to provide information, services and/or products requested by you if you decide to do so, and we will not be liable to you in this regard.

Lawful Disclaimer

As required by laws and regulations, the Company may disclose your personally identifiable information and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, legal process served or served by governmental, intergovernmental or other regulatory bodies. The Company is not liable for misuse or loss of personal information or otherwise on the website(s) of the Company to which the Company has no access or control.

Due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or because of your acts or omissions or by a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not), the Company will not be liable for unlawful or unauthorized use of your personal information.

Changes to this policy on privacy

From time to time, our Privacy Policy is reviewed to take account of new laws and technologies, changes to our operations and practices, and to ensure that the changing environment remains appropriate.

We will post those changes to this Privacy Policy and other places we deem appropriate if we decide to change our Privacy Policy, so that you are aware of what data we collect, how we use it, and under what circumstances we disclose it, if any.

If you've got a complaint

You can submit a complaint if you are concerned about any aspect of our privacy practices. This will be promptly acted upon. Please contact us via email at support@hextraprime.com to make a complaint.



How to get in touch with us

Please e-mail us at support@hextraprime.com if you have any inquiries regarding this Privacy Policy.
