

FINDOR CAPITAL | PRIVACY POLICY

OCTOBER 2024

Regulated by the Financial Services
Commission of Mauritius

Version:
Review Date:
Board Approval Date: DD-MMM-YYYY

PRIVACY POLICY ON DATA PROTECTION

The EU General Data Protection Regulation (GDPR) became effective on May 25, 2018, and in response, Mauritius implemented the Data Protection Act 2017 (DPA) on January 15, 2018. The DPA replaced the previous Data Protection Act 2004 and was designed to strengthen data subject control and personal autonomy over personal information, aligning with international standards such as the GDPR and the European Convention for the Protection of Individuals about the automatic processing of personal data.

The DPA was created to address the challenges presented by technological advancements and other developments in data protection. It seeks to provide effective data protection provisions for Mauritius while aligning with international best practices. The term "personal data" is used interchangeably with "personal information" in this document, both of which refer to any information relating to an identified or identifiable natural person.

The DPA aims to protect the privacy rights of individuals, ensuring that personal data is processed in a lawful, fair, and transparent manner. It also sets out the obligations of data controllers and processors, including requirements for obtaining consent, ensuring data accuracy, and implementing appropriate security measures.

Overall, the DPA represents a significant step forward for data protection in Mauritius, providing greater protection for individuals and aligning with global best practices.

COLLECTION OF YOUR PERSONAL INFORMATION

The Company collects and processes the following information depending on the services to be provided:

a) Personally, Identifiable Information:

- Personal details provided when registering for a Real/Demo Account, such as name, email and postal addresses, telephone number, country of residence, employment status, financial background, login, and password details.
- Identity and residence verification information, including legal name, business name, and Tax ID for business entities, and date of birth. An identity document and proof of residence must also be provided.
- Details of requests or transactions made through the Services, with payment information collected by third-party payment processors.
- Information required for subscribing to services, including updates and access to restricted portions of the Site.
- User-generated content, such as comments, contributions to discussions, and messages to other users, as well as communications with Findor Capital.
- Information provided for participation in webinars, including name, email address, feedback, and responses to quizzes, tests, and surveys.

- Information provided when accessing third-party sites, such as Facebook and Twitter.
- Information provided in response to surveys, including race, education history, trading history/experience, and employment information.
- Nonfinancial individual-level user data collected by Partner sites providing Online course-related tools and services to Findor Capital users.
- Information collected under the Anti-Money Laundering Policy, including sources of money.

b) Information relating to your use of our Site:

- Findor Capital uses this information to operate the service, maintain service quality, and generate general usage statistics for the Findor Capital Website. It is important to note that personally identifiable information or sensitive data disclosed publicly on Findor Capital message boards may be collected and used by others.
- Our Site tracks, collects, and aggregates information about user activity, including which pages were visited, in what order, when, and which hyperlinks were clicked, as a form of traffic analytics.
- Findor Capital automatically collects information about the computer hardware and software of users, as well as information about URLs from which they linked to our Site. This information includes the user's IP address and geographic location, operating system and browser type, domain names, access times, and referring Website addresses.
- We collect anonymous demographic information, such as ZIP code, age, gender, preferences, interests, and favorites, which is not unique to individual users.
- Findor Capital uses cookies and web beacons when users visit our Site. For more information about our use of cookies and web beacons, please refer to our Cookie Policy.

It is your responsibility to make sure that the Personally Identifiable Information you give to Findor Capital is accurate. Providing inaccurate information may affect your ability to use the Site, receive accurate information, and for us to contact you. We do not read your private online communications. When you choose to link to other websites from Findor Capital, we encourage you to read and understand their privacy policies. Findor Capital is not responsible for the privacy policies or content of other websites outside of our own.

By submitting Personally Identifiable Information to us, you agree that we may collect, use, and disclose that information according to our Privacy Policy and Terms of Use, and as permitted by law. If you do not agree with these terms, do not provide Personally Identifiable Information to us. If you refuse or withdraw your consent, or if you choose not to provide required Personally Identifiable Information, we may not be able to provide you with services on our Site. You can withdraw your consent at any time by navigating to your profile page and clicking the box to remove consent or by deleting your account. Please note that we may also continue to process your data based on legitimate interests or to fulfill a contract.

USE YOUR DATA

Findor Capital gathers and utilizes your personal data to operate its website and comply with its contractual obligations to provide the services you requested. The company also secures your account, improves, promotes, and safeguards its services, verifies the identity of creators, and prevents fraudulent activities. Furthermore, your personal data is used to create and manage your account, communicate with you, and personalize your experience with Findor Capital. You may also receive information about other products or services from Findor Capital and its affiliates. However, before any direct marketing communication from affiliates, you will be asked for your clear and explicit consent. When you sign up for email or update services, we may use your Personally Identifiable Information to send you messages related to the site or online webinars. We may archive this information and use it for future communication where legally permitted. Additionally, we may share Online Course information with tutors or designated individuals who assist with creating, modifying, or operating the course.

Findor Capital advises against posting any Personally Identifiable Information or sensitive information on the Forums, Blogs, or Media Walls of their website. Such information may be collected and published via third-party services or used in future course offerings. Findor Capital may contact you through surveys to gather information about your opinion of their services or potential new services that may be offered. Findor Capital does not sell or rent customer lists to third parties, but may contact you on behalf of external business partners for offerings of interest. Findor Capital may share data with trusted partners to help perform statistical analysis, provide customer support, or arrange deliveries, and requires these third parties to maintain the confidentiality of information. Findor Capital may also share information with certain thirdparty services to help provide, improve, promote, or protect their Services, but require these services to protect personal information to the same standards. Aggregated and anonymized information may also be shared.

Findor Capital respects your privacy and does not disclose sensitive personal information without your explicit consent. The company tracks the websites and pages its customers visit to determine the most popular services and deliver customized content and advertising to those who are interested in specific subjects.

Findor Capital will only disclose your personal information if required to do so by law or in good faith to conform to legal processes, defend its rights and property, protect its employees, users, customers, or others, defend against legal claims, or investigate and prevent illegal activities. Additionally, Findor Capital is required by law to collect and use your data, such as for compliance with tax laws and other reporting standards, and to follow the rules set by its supervisory authority (FSA). However, the company will only collect, retain, and use your personal information when there is a legitimate interest that does not harm your interests and rights.

Findor Capital may provide links to other websites or services that it believes may interest you. These third-party sites have their own privacy policies and Findor Capital does not endorse or assume responsibility for their privacy practices. If you choose to visit one of these sites, you should review their privacy policy to understand how they collect and use your personal information.

RIGHT OF USER

As a user, you have the right to access, correct, or delete your Personally Identifiable Information held by Findor Capital. You can also choose whether or not you wish to receive material from the company or its partners. If you reside or are in the EEA, you have additional rights, including the right to access your Personally Identifiable Information, prevent processing for direct marketing purposes, update or delete your information, restrict processing, and receive a copy of your information.

Findor Capital will offer you the opportunity to opt out of disclosure to third parties or the use of your information for purposes different from its original collection or authorized by you. If you want to exercise your rights, you can contact Customer Support via email, telephone, fax, or postal mail.

However, residual information may remain within the company's databases, access logs, and records, which may or may not contain Personally Identifiable Information. Some information may also be exempt from requests due to legal obligations. When you make a request, you may need to confirm your identity.

COOKIES POLICY

Our website uses cookies and similar technologies to enhance your experience, to understand how you use our website, and to improve the quality of our services. A cookie is a small data file that is sent to your browser from a web server and stored on your device. You can configure your browser to accept or reject cookies or to notify you when a cookie is sent. However, please note that some features of our website may not function properly if cookies are disabled.

We use cookies for various purposes, including:

- a) **Essential cookies:** These cookies are necessary to enable the core functionality of our website, such as accessing secure areas, remembering items in your shopping cart, or maintaining your login status.
- b) **Analytical cookies:** These cookies allow us to collect data on how visitors use our website, such as which pages are visited most frequently, or which products are viewed. This information helps us to optimize our website and improve the user **experience**.
- c) **Performance cookies:** These cookies enable us to track the performance of our website, such as page load times or response times, to identify and fix issues and improve overall performance.
- d) **Advertising cookies:** These cookies are used to deliver advertisements that are relevant to you and your interests. They may also be used to limit the number of times you see an ad or to measure the effectiveness of advertising campaigns.

We may also use third-party cookies, which are cookies set by a domain other than our own. For example, we may use third-party analytics tools to help us understand how visitors use our website, or we may allow third-party advertisers to place cookies on our website to serve personalized ads.

By using our website, you consent to the use of cookies as described in this policy. You can manage cookie preferences in your browser settings or opt out of targeted advertising by using the opt-out links provided by the advertising networks. Please note that opting out of advertising cookies does not mean that you will no longer see ads, but rather that the ads you see will not be tailored to your interests.

YOUR INFORMATION IS PROTECTED

We understand the importance of keeping your personal information secure and take measures to protect it. This includes physical, electronic, and procedural safeguards to prevent unauthorized access, use, or disclosure of your personal information. However, it is important to note that no method of transmission over the Internet or electronic storage can be completely secure, and as such, we cannot guarantee the absolute security of your personal information. You are responsible for ensuring the security of your login information.

We store your personally identifiable information on computer servers in a controlled and secure environment protected from unauthorized access, use, or disclosure. When personal information, such as a credit card number, is transmitted to other websites, it is encrypted using the Secure Socket Layer (SSL) protocol.

We do not share your personal information with non-affiliated third parties without your explicit and specific consent, except as described in this Privacy Statement. When we collect your personal information, we will inform you of the recipient or categories of recipients who will receive this information. We will also promptly notify you when your data is first shared with a third party. We may disclose aggregate information, such as demographic information and statistical analyses, to third parties such as advertisers or business partners. This aggregate information does not include any personal information.

ONGOING UPDATE

Findor Capital will occasionally update this Privacy Policy and practices to reflect changes in data privacy law. The most recent version of the Privacy Policy will always be posted on the Company's website. Anytime that we do make such changes, we will also update the effective date listed at the bottom of the Privacy Policy.

Any change, update, or modification will be effective immediately upon accessing, browsing, and/or using the Company's website. Findor Capital encourages you to periodically review this Policy to be informed of how we are protecting your information, how you can manage the

information you share with us, and to ensure familiarity with the most current version of this Policy.

We will let you know about any material changes, either by notifying you on the Site or by sending you an email. New versions of this Policy will never apply retroactively - we will tell you the exact date they go into effect. If you keep using our services after a change, that means you accept this, Policy. This updated version of the Policy gives you more control over your information and explains how we use it.

LEGAL DISCLAIMER

Findor Capital reserves the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our website. We will not be liable for misuse or loss of personal information resulting from cookies on our website that we don't have access to or control over. We will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious, however, contacted.

CONSENT

By continuing to use our services, you agree to the terms of this Privacy Policy and the collection, use, disclosure, retention, and protection of your personal information as described herein. If you do not agree with this Policy or any of its terms, you should discontinue your use of our services. Your continued use of our services after the effective date of any modifications to this Policy constitutes your acceptance of those modifications.