

INTRODUCTION AND SCOPE

This Privacy Notice describes the way SFORS Group of companies (collectively “**SFORS**”, “**our**”, “**us**” or “**we**”) is committed to respect and safeguard your privacy while collecting, using, disclosing or otherwise processing Personal Data.

“Personal Data” refers to any information that permits your identification as a specific individual. Such information may be in isolation or in combination with other data, direct or indirect.

For the purposes of this Privacy Notice, "you" or "your" refers to any individuals interacting with us or whose personal information we need to process in connection with providing our Services.

This Privacy Notice shall not be applied towards any personal data and personal information we collect and process in our capacity as an employer or a party to contractual business relationships.

ABOUT OUR GROUP AND CONTROLLER IDENTIFICATION

This Privacy Notice is issued on behalf of the SFORS group of companies, so when we mention "SFORS", "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company in the SFORS Group responsible for processing your data.

The specific entity acting as the Data Controller for your personal information depends on how you interact with us:

Website Visitors: If you visit our websites and interact with its contents, the controller of your personal information is typically SM Seven Green Trading LTD.

Joint Responsibility: In certain instances, entities within the SFORS group may process your data jointly (as "Joint Controllers") for centralized purposes including, but not limited to, global IT infrastructure management, or group-wide compliance.

A full list of the legal entities within the SFORS group, including their locations and contact details, is set out in the contact section below

- SM Seven Green Trading LTD
- ST Solutions LTD
- Equistream Trading DMCC
- 2055 LTD

PERSONAL INFORMATION WE COLLECT

SFORS collects different Personal Data depending on the context of your interaction with us, personal information you provide us with, choices you make, your location and applicable laws. Where you provide the personal information about other individuals, you are responsible to ensure you possess the necessary authority to do so and such individuals are acknowledged to the terms of processing under this Privacy Notice.

At all times, you shall be also responsible for ensuring that any Personal Data provided to us is accurate and up-to-date.

Information Provided Directly by You is limited to information you share of your own volition or in direct response to our professional inquiries. This typically occurs when you reach out to us via our listed contact details, submit a request for information, or engage in pre-contractual communications with our group entities.

Information Collected Automatically includes tools capturing technical details such as IP addresses, browser specifications, and operating system data. We monitor your engagement metrics, such as webpage views, interaction patterns, and time spent, to evaluate the performance and user experience of our digital environment. This collection, facilitated by cookies and tracking pixels, is intended to maintain the security and operational integrity of our online infrastructure.

Information Obtained from Third-Party Sources refers to information from various external sources, including public registries, search engines, social media platforms, and government websites or financial sanction lists. Additionally, we may receive data from identity verification service providers and other third parties where you have authorised such disclosure or where we are legally permitted to obtain such information for regulatory and compliance purposes.

We collect and process the following categories of Personal Data from website visitors, contractors, suppliers, counterparties:

- **General data:** name, surname, gender, title, organisation and job title, phone number, email address.
- **Compliance data:** Government identification information and documents, dates of birth, details on beneficial ownership, and due diligence data.
- **Device data:** Internet Protocol (IP) addresses, unique device identifiers (UDID), email metadata, and browser/operating system specifications. This category encompasses Usage Data (such as engagement patterns, search queries, and time spent on our sites), general Location Data (state and country), and diagnostic information captured via cookies and pixels to maintain the security, performance, and operational integrity of our digital infrastructure.
- **Other categories of data** provided at your own initiative without our explicit request, including information shared via unsolicited communications or other discretionary interactions with us.

PURPOSES AND LEGAL BASES FOR PROCESSING

SFORS uses your personal information for a particular purposes. Some of the jurisdictions require from us to possess a legal basis to process your information. Therefore, the purposes and the legal basis are as follows:

PURPOSE	LEGAL BASIS	DATA IN USE
Communication with you and respond to your enquiries, requests or complaints.	<ul style="list-style-type: none"> • Consent • Performance of Contract • Legal Obligation • Legitimate interest 	<ul style="list-style-type: none"> • General data • Other data
Compliance with statutory, legal, anti-money laundering (AML), reporting and tax obligations under relevant applicable law which we are subject to. This includes our obligations to respond to your inquiries under relevant data protection law.	<ul style="list-style-type: none"> • Legal obligation 	<ul style="list-style-type: none"> • General data • Compliance data • Other data

Administration, improvement and management of our website and IT systems, including use of tracking technologies (e.g. cookies), website analytics etc.	<ul style="list-style-type: none"> • Consent • Legitimate interest 	<ul style="list-style-type: none"> • General data • Device data • Other data
Protection of our legitimate business interests within the course of exercise or defence of legal claims	<ul style="list-style-type: none"> • Legitimate interest • Legal obligation 	<ul style="list-style-type: none"> • General data • Compliance data • Other data
Protection of vital interests: ours and other individuals	<ul style="list-style-type: none"> • Legitimate interest • Legal obligation 	<ul style="list-style-type: none"> • General data • Other data

PROTECTION OF VITAL INTERESTS: OURS AND OTHER INDIVIDUALS

Your Personal Data may be shared with the following categories of recipients:

SFORS Group of companies. We share personal data within the group entities to ensure the relevant entity manages personal information entrusted to us.

Third-Party Service Providers, Suppliers or Contractors. We share the personal information with certain external vendors acting under our instructions and for the data processing purposes outlined above. In particular, such may include (but not limited to) IT and cloud systems, finance systems, professional advisors (auditors, and insurance providers), CRM systems, marketing development systems etc.

Legal, Regulatory, and Law Enforcement Disclosures. We may disclose the relevant personal information in terms of our legal and statutory obligations under the relevant legislation and before the relevant authorities. This could include tax reporting obligations, governmental requests or following law enforcement requirements.

INTERNATIONAL DATA TRANSFERS AND SAFEGUARDS

We may transfer your personal information to jurisdictions where our Group entities or third-party service providers maintain operations. While we prioritize transfers to regions with recognized adequacy standards (such as the UK, EU, or EEA), your data may be processed in countries where data protection laws differ from those in your home jurisdiction.

To ensure your information remains protected, we implement, in particular, the following safeguards:

- **Standard Contractual Clauses (SCCs):** Utilizing approved contractual frameworks to ensure recipients uphold data protection standards equivalent to those in the EU/UK.
- **Contractual Necessity:** Where the transfer is essential to fulfill our service obligations or terms of engagement with you.
- **Informed Consent:** In specific instances where you have explicitly authorized the cross-border transfer of your information.

DATA RETENTION AND STORAGE

In most cases we retain personal information only for the duration necessary to fulfill the specific purposes for which it was collected. Once your data is no longer required, or upon a valid request for erasure, we take all reasonable steps to remove it from our active systems or ensure it is no longer identifiable.

However, there might be instances where your data may be retained since we are legally mandated to do so. This includes compliance with tax, corporate, and financial record-keeping laws, or where data is necessary for the establishment and defense of legal claims.

If the basis for processing changes or the retention period expires, we apply one of the following protocols to ensure data security:

- **Permanent Deletion:** Information is securely and irretrievably erased from our primary systems and backups.
- **Anonymization:** Data is modified so that it can no longer be linked to any specific individual, effectively removing its status as personal information.
- **Pseudonymization and Encryption:** In specific cases, data may be pseudonymized or encrypted to limit its accessibility while meeting secondary operational requirements.
- **Secure Archiving:** Data is put beyond further use and archived under strict security protocols to comply with legal record-keeping obligations or for the defense of potential legal claims.

DATA SECURITY AND TECHNICAL MEASURES

We have developed and implemented the appropriate security, technical, physical, organizational and administrative measures to ensure every piece of Personal Data is well-protected from any sort of threats like loss, misuse, alteration, breach, disclosure of use.

YOUR GLOBAL PRIVACY RIGHTS AND CHOICES

Under this Privacy Notice you shall possess the following rights:

1. Where the Processing of Personal Data is based on your consent – the right to withdraw this consent. The individual may decline giving his or her consent (including explicit consents) or even withdraw the consent for processing anytime.

2. Request us to provide an individual with the information about Personal Data that we process, including obtaining a copy of such Personal Data that we may hold.

This information may, in particular, include the purposes of Processing, categories of Personal Data, recipients whom the Personal Data is being disclosed to, and the source which the Personal Data has been obtained from.

3. To request us to rectify and erase your Personal Data in certain cases.

4. To request us to correct and/or update your Personal Data.

5. **Right to Object.** You may challenge our processing of your data if it is based on our legitimate interests and conflicts with your specific situation. You have an absolute right to object to direct marketing at any time. Additionally, you may request a manual review of any automated decisions (including profiling) that produce legal or similarly significant consequences.

6. **Right to Restrict Processing.** You can request that we "freeze" the use of your Personal Data in the following scenarios:

- Accuracy: While we verify the data after you contest its accuracy.
- Unlawfulness: If the processing is illegal, but you prefer restriction over deletion.
- Legal Claims: When we no longer need the data, but you require it to establish or defend legal claims.
- Verification: While we evaluate if our legitimate grounds override your objection to the processing.

7. Right to Data Portability. You have the right to receive the personal information you provided to us in a structured, machine-readable format. Where technically feasible, you may also request that we transfer this data directly to another entity of your choice without hindrance.

8. Right to Non-Discrimination. We will not discriminate against you for exercising any of your privacy rights unless permitted by relevant law.

COOKIES AND SIMILAR TRACKING TECHNOLOGIES

This section explains how we use cookies and similar tracking technologies on our website, and how you can manage your preferences.

A cookie is a small simple file that is sent along with pages of this website and stored by your browser on the hard drive of your computer or another device. The information stored therein may be returned to our servers or to the servers of the relevant third parties during a subsequent visit.

We use the following categories of cookies:

- Strictly Necessary Cookies: Essential for the website to function, secure session validation, and privacy preference storage.
- Analytical/Performance Cookies: Allow us to recognize, count, and track anonymous website traffic statistics and user behavior.

Your choices regarding non-essential cookies are captured and managed through our integrated Consent Management Platform (CMP). When you access our website for the first time, you are presented with a cookie banner that allows you to opt-in or opt-out of specific cookie categories.

For a complete list of the specific individual cookies we arrange including exact technical names, specific processing purposes, third-party operators, and absolute storage periods, please refer directly to our Cookie Policy at <https://acrobat.adobe.com/id/urn:aaid:sc:va6c2:946f889a-49bc-4c34-ae0e-89851db85249> .

You can disable the use of cookies via your internet browser and automatically or manually delete cookies. You can also specify that certain cookies may not be placed or to change the settings of your internet browser so that you receive a message each time a cookie is placed.

Please note that our website may not work properly if all cookies are disabled. If you do delete the cookies in your browser, they will be placed again after your consent when you visit our website again.

UPDATES TO THIS PRIVACY NOTICE

We may review this Notice occasionally for introduction of the best data protection practices, or more frequently in case of any legislative or regulatory changes. Any updates will be published on this page with a revised "Last Updated" date at the top of the document.

We encourage you to review this Notice regularly to stay informed about our data protection standards.

HOW TO CONTACT US

If you have any questions about this Privacy notice, we welcome you to contact us here:

SM Seven Green Trading LTD

Postal Address:
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