

PRIVACY POLICY

1. Introduction

1.1. "Kabwohe Omukace OÜ" (hereinafter referred to as "the Company"), (operating under the trading name "TradeStap") whose registered office is at Rävåla pst 8, 10143, Tallinn linn, Harju maakond, Eesti Vabariik, is registered as Corporation under Entity Number 14789250.

1.2. The Company is committed to protect individuals' personal data in line with the requirements of applicable law.

1.3. Personal data shall be processed in compliance with following principles:

-collected for specific, explicit, and legal reasons and not further processed in a way that is incompatible with those aims;

-processed fairly, lawfully, and transparently;

-appropriate, relevant, and limited to what is required for the purposes for which they are processed;

-accurate and, where applicable, up to date;

-retained in a manner that allows data subjects to be identified for no longer than is required for the purposes for which the personal data are processed;

-processed in a way that ensures acceptable personal security, including as protection from unauthorized or unlawful processing, as well as accidental loss, destruction, or damage.

1.4. The Policy applies to all personal data that the Company holds relating to identifiable individuals.

1.5. By accepting this Privacy Policy (hereinafter "Policy"), you are agreeing to the Company collecting, using, and managing personal information from visitors, potential and active clients, and clients who have terminated their business relationship with the Company who access or use the Company's website(s) and mobile applications.

1.6. This policy is an element of the Client's agreement with the Company.

1.7. 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 current privacy notice. If we make changes we consider to be important, we will communicate them to you.

2. Personal Data that we may collect:

2.1. The types of personal information we may need from you are listed below:

-First, middle and last name, e-mail address, financial information, residential address, phone number, date of birth, a copy of your national identity card, passport, or driving license, a copy of a recent utility

bill/bank statement (or similar) as proof of your residential address, credit or debit card, bank account details, tax residence and Tax Identification Number, profession, and employment information, knowledge and experience in trading, risk tolerance and risk profile, and any other information we deem relevant for our functions and operations, as well as to be able to deliver our services to you.

-Personal data for tax and financial purposes, such as your Tax Identification Number and country of residence, annual income, net worth, source of funds, anticipated account, turnover, bank account, bank statements, payment card details and copies, and e-wallet information;

-Transaction data includes information regarding payments to and from you, as well as information about the products and services you've purchased from us, deposit methods, and the purpose for your transactions with us;

-Technical data such as your IP address, login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website or data about how you use our website, products, and services;

-Profile data such as your login and password, purchases or orders made by you, your interests, preferences, comments and survey replies, and marketing and communication data such as your preferences in getting marketing from us and our third parties, as well as your communication preferences.

2.2. To the extent permitted by law and essential for the performance of our legal obligations, the Company may additionally process sensitive personal information such as information concerning criminal convictions and crimes for employment purposes.

2.3. If you refuse to supply personal data when the Company requests it, the Company may be unable to offer a service or enter into an agreement with you. In this case the Company will notify you.

2.4. We keep track of all electronic, telephone, in-person, and other conversations we have with you regarding the services we provide and our relationship. These recordings will be our exclusive property and will serve as proof of our discussions. Without the use of a warning tone or any other additional notification, such telephone calls may be recorded.

3. The Purpose of Using Your Personal Information, Disclosure and Safety

3.1. Client information is to be treated as confidential by the Company and will not be used for any reason other than the supply, administration, and improvement of the Services, anti-money laundering and due diligence checks, research and statistical purposes, and marketing purposes. Information that is already in the public domain or that the Company has in its possession without a duty of confidentiality will not be considered confidential.

3.2. We use your personal data for:

- to confirm/verify your identity;
- to assess your appropriateness/suitability for the products and services the Company provides;
- to process your transactions;
- to provide you with transaction and post transaction related services;
- to identify, assess, mitigate, prevent, and investigate fraudulent activity of any kind that is prohibited by applicable legislation;
- the Company utilizes your information to keep you informed about your transaction, including deposit, withdrawal, and post-transaction reports confirmation e-mails;
- the Company may contact you in connection with the KYC process to remind you to upload any missing KYC documents and/or to update your KYC documentation;
- to manage your account with the Company;
- to keep you informed about issues affecting your business connection with us;
- to analyze statistical data so that we can provide you with better products and/or services;
- to strengthen the Company's network and system security procedures;
- to defend the Company against potential legal claims;
- The Company utilizes your data to provide you with information about your trading activity, such as margin calls, stop losses, price alerts, and other information relevant to your trading activity with us;
- to keep you informed about products and services that may be of interest to you.

3.3. The Company has the right to disclose Client information in the following circumstances:

- as required by law or by a competent Court's order.
- if regulatory body with control or jurisdiction over the Company, the

Client, or their affiliates, or in whose territory the Company has Clients, requests it.

- to relevant authorities to investigate or prevent fraud, money laundering, or other unlawful behavior, as required by law and in response to other legal and regulatory requirements.
- if the Company needs to defend or exercise its legal rights before a court, tribunal, arbitrator, Ombudsman, or governmental authority;
- to payment service providers and banks processing your transactions to the amount reasonably required to execute Orders;
- to payment service providers and banks processing your transactions;
- to auditors, contractors, or other advisers auditing, assisting with, or advising on any of our business purposes;
- 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 that help the Company collect, store, process, and use Client information, get in touch with the Client, or improve the provision of the Services under this Agreement;
- to other service providers for statistical reasons to improve the Company's marketing;
- to market research call centers that conduct telephone or email surveys to improve the Company's services;
- to anybody you authorize;
- to a Company Affiliate or introducing broker, or to any other company in the Company's group;
- to any third-party for the purpose of enforcing or applying our Client Agreement or other related agreements.

3.4. Non-affiliated companies who assist the Company in providing services to you are expected to keep your personal information confidential and to use it only in the course of providing those services for the goals that the Company specifies and within the rule of law.

3.5. The Company does not allow third-party service providers to use your personal data for their own interests, and only allows them to process it for certain purposes and according to the Company's instructions.

3.6. Data encryption, access management procedures, 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, and other technical and organizational measures are implemented by the Company. Furthermore, the Company restricts access to

the Client's personal data to those employees, agents, contractors, and other third parties that require it for their jobs. They are bound by a duty of secrecy and will only process the Client's personal data according to the Company's instructions.

3.7. Your personal information may be saved both electronically and on paper.

3.8. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious.

4. How long does the company maintain personal information?

4.1. After termination of the Agreement, we will only keep your personal data for as long as we reasonably require it for legal or business purposes, up to five (5) years. We consider local laws, contractual obligations, and our customers' expectations and requirements when setting data retention durations. We securely erase or delete personal data when we no longer require it.

4.2. The Company will seek your permission before sending you marketing information about the products and services it offers. Accepting the conditions of this Privacy Policy constitutes your consent.

4.3. You may cancel your consent at any time by contacting the Company.

4.4. The Company will not disclose any of its clients' sensitive information to a third party unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure will occur on a 'need-to-know' basis. In such cases, the Company must expressly inform the third party of the information's confidential nature.

5. Collect and/or Process your data methods

5.1. The Company may obtain your personal data in a variety of ways, including directly from you and/or through automated technologies, interactions, and/or through third parties via publically available sources.

5.2. The Company may automatically collect technical data about your equipment, browsing activity, and habits when you use the Company's website. Cookies and other similar technologies are used to gather this personal data, according to the Company's Cookies Policy. If you visit other websites that use the Company's cookies, the Company may obtain technical data about you.

5.3. Personal data can include technical data from analytics providers such as Google, contact, financial, and transaction data from payment service providers, and identity and contact data from individual and publicly available

sources.

6. Cookies

6.1. Cookies are little text files with unique ID tags that are saved in your browser

directory or application data subfolders on your computer.

6.2. When you visit a website that uses cookies to keep track of your travels inside the site, assist you resume where you left off, remember your registered login, theme selection, preferences, and other customization capabilities, cookies are formed. The website stores a corresponding file (with the same ID tag) to the one they set in your browser, and they can track and store information on your movements within the site as well as any information you may have voluntarily given while visiting the website, such as your email address, in this file.

6.3. Cookies are typically required for websites with large databases, logins, custom themes, and other advanced features.

6.4. The Company does not use cookies to collect information about you personally. The Company's cookies solely collect anonymous information in order to improve our services.

6.5. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's site(s) that the Company does not have access to or control over.

7. Transfers of personal data to third countries

7.1. Copies of your agreement with us may be transferred to and held at banks located worldwide. It may also be processed by staff from one of our suppliers or Affiliate firms who work worldwide. We shall take all reasonable steps to ensure that any such transfers are made in accordance with applicable legislation and, where necessary, subject to suitable protections. You may contact the Company to learn about the necessary or appropriate precautions (as the case may be).

8. Your rights

8.1. Right of access – you have the right to seek a copy of the personal information we have about you.

8.2. Right to rectification – you have the right to ask us to correct any inaccurate or incomplete personal data we have about you.

8.3. Right to be forgotten – you have the right to request that we erase your personal data from our records in certain circumstances.

8.4. Right to data restriction – you have the right to request that we restrict the processing of your personal data in certain circumstances.

8.5. Right to data portability – you have the right to request that the data we hold about you be transferred to another organization.

8.6. Right to object – you have the right to object to certain types of processing on grounds relating to your particular situation, 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 that makes you want to object to processing on this ground because you believe it impacts on your fundamental rights and freedoms. We may be able to show that we have compelling legal grounds to handle your information that outweigh your rights and freedoms in some situations.

8.7. Right to request that your personal data be transferred to you or a third party. We shall give your personal data in a structured, commonly used, machine-readable manner to you or a third party you specify. This privilege only applies to automated information that you gave us permission to use or where we utilized the information to fulfill a contract with you.

8.8. Right to file a complaint – if you have reason to suspect that the Company is misusing your personal data, you have the right to file a complaint.

8.9. Right to withdraw – you have the right to withdraw your permission, as stated above. However, the Company may not be able to offer you with certain products or services in this situation.

9. Contacting us about this Policy or making a complaint

9.1. Please contact us using the details provided below if you have any questions concerning the contents of this Policy, wish to notify us of a change or correction to your personal data, would like a copy of the data we collect on you, or have a complaint or comment: E-mail: [**complaint@\(домен компании\)**](mailto:complaint@(домен компании))

9.2. We make every effort to respond to your request quickly and in any event within one month of receiving it. If your request takes longer than one month to complete, we will notify you and keep you updated. It is worth noting that the information you will receive as a result of exercising your right will be provided free of charge.

9.3. You have the right to file a complaint with our supervisory authority, if you are dissatisfied with our response to your complaint and/or your request was not processed within the prescribed periods.

10. Privacy Policy Changes

10.1. The Company maintains the right to modify the Privacy Policy at any time without giving you prior notice, as long as the changes do not significantly reduce your rights under the Privacy Policy. If the Company makes major changes to this policy, you will be notified via email, a notice on the Company's home page, or by updating the version of the document, including the date of the update, which will be displayed on the first page of the document. At all times, the most recent and current version of this Policy will be available at (домен компании) Any changes to the Policy will take effect as soon as they are posted on the Company's website.