

PRIVACY POLICY

1. Introduction

Zarvista Capital Markets Ltd (hereinafter called "We", or the "Company") is authorised by Mwali International Services Authority in Comoros Union with license number T2023293 with registered office at Bonovo Road – Fomboni Island of Mohéli – Comoros Union.

Protecting the privacy and safeguarding the personal and financial information of Company's clients and website visitors is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information.

2. Collection of Personal Information

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address. We also collect birth date and your location information.

In order to receive more information, register for a demo account, open a trading account with us or for any other business relationship, you are requested to complete the Application Form. By completing the Application Form and providing your personal information, you enable us to evaluate the application and comply with laws and regulations governing the provision of financial services. The same information will be used by the Company to contact you regarding the offered services. The Personal Data collected by the Company might include, but not limited to:

- Personal information you provide to us on applications and other forms, such as your name, surname, address, e-mail address, phone number, date of birth, gender, occupation and employment details;
- Financial information such as your income, assets and net worth;
- IP address
- Bank account, e-wallets and credit card details, tax information
- Documents that you provide to us to verify your identity, such as your passport/identity card, utility bills and/or bank statement or your company incorporation details.

3. Use of Personal Data

The Company collects and process Personal Data which are required for the evaluation. Establishment and maintenance of the contractual relationship between the Company and the Client. In some cases, the Company may also process the Client's Personal Data to pursue its legitimate interests or those of third parties, provided that the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

The Company may use your personal information for one or more of the following purposes:

- to confirm/verify your identity;
- to assess your appropriateness/suitability to the products and services we provide;
- to process your transactions;
- to manage the account the Client holds with the Company;
- to provide you with transaction and post transaction related services;
- to inform you of products and/or services that may be of interest to you;
- to keep you updated on the issues that are relevant to your business relationship with us;

- to analyse statistical data to enable us to provide you with better products and/or services;
- to enhance the security controls of the Company's networks and systems;
- to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation;
- to defend possible legal claims;

The Company needs to comply with the Anti-money Laundering regulations of Mwali International Services Authority, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also, the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept to be able for the Company to demonstrate to the regulator that has acted in accordance with the legislation.

4. Disclosure of Personal Data

Any personal information is treated as confidential and may be shared within the Company and its partners to meet its contractual and legal obligations. Contractual relationships exist with the Company's partners aiming to safeguard the Client's personal data in accordance with the Data Protection Legislation. Our company partners maintain the privacy of your information to the same extent the Company does in accordance with the policy. Non-affiliated companies that assist the Company in providing services to you are required to maintain the confidentiality of such information and to use your personal information only in the course of providing such services for the purposes that the Company dictates and within the ambit of the applicable law.

Recipients of Personal Data may be for example:

- technological experts that appointed by the Company to support the smooth operation of our systems
- platform providers
- payment service providers/credit institutions for facilitating the incoming and outgoing payments of the Clients
- governmental authorities and regulatory bodies
- fraud prevention agencies, third party authentication service providers, verification/screening service providers
- data reporting service providers to meet our regulatory obligations • external consultants

5. Affiliates and Partners

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

6. Non-affiliated third parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below. We reserve the right to disclose your personal information to

third parties where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property. To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

7. Cookies

Cookies are small text files, given ID tags that are stored on your computer's browser directory or program data subfolders. Cookies are created when you use your browser to visit a website that uses cookies to keep track of your movements within the site, help you resume where you left off, remember your registered login, theme selection, preferences, and other customization functions. The website stores a corresponding file (with same ID tag) to the one they set in your browser and in this file they can track and keep information on your movements within the site and any information you may have voluntarily given while visiting the website, such as email address.

Cookies are often indispensable for websites that have huge databases, need logins, have customizable themes, other advanced features.

Cookies usually don't contain much information except for the URL of the website that created the cookie, the duration of the cookie's abilities and effects, and a random number. Due to the little amount of information a cookie contains, it usually cannot be used to reveal your identity or personally identifying information.

There are two types of cookies: session cookies and persistent cookies. Session cookies are created temporarily in your browser's subfolder while you are visiting a website. Once you leave the site, the session cookie is deleted. On the other hand, persistent cookie files remain in your browser's subfolder and are activated again once you visit the website that created that particular cookie. A persistent cookie remains in the browser's subfolder for the duration period set within the cookie's file.

The Company's website uses cookies to provide the functionality you need to browse our site correctly.

The Company's website issues cookies upon landing on our website, unless the user has changed their cookie settings in their browser to refuse cookies. Please note that with cookies switched off, some areas of our website and services might not be made available to you.

The Company does not use cookies to personally collect information about you – the cookies that we use only collect anonymous information to optimize our services and do not collect personal information.

8. Changes of Privacy Policy

The Company reserves the right to change or amend the Privacy policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this policy, we will notify you by email or by means of a notice on our home page or by changing the version of the document including the date of the update which will be visible to the first page of this document. The latest and prevailing version of this Policy will at all times be



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available at <https://www.zarvistacm.com/>. Any revised Policy will be effective immediately upon posting on our Website.

9. Legal Disclaimer

The Company reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served. 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. 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.

Further information on Company's Privacy is available upon request by using the email address: support@zarvistacm.com