

PRIVACY POLICY

Original Issue Date:	November 2 nd , 2020
Approver(s):	Director
Owner(s):	First SW Group FZE
Contact Person:	Compliance Officer
Classification:	Privacy Policy
Operational Applicability:	All personnel
Geographic applicability:	Worldwide
Last Revision Date:	November 2 nd , 2020
Last Reviewed Date:	November 2 nd , 2020
Version:	1.0
Other Languages:	N/A

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1. INTRODUCTION

- 1.1. **FIRST SW GROUP FZE** is a Free Zone Establishment incorporated under the laws of the United Arab Emirates in Fujairah Media Free Zone with License Number (**11127/2017**), having its registered office at 17th and 18th Floor, Creative Tower, Fujairah, United Arab Emirates (hereinafter (the "**Company**", "**we**" or "**us**").
- 1.2. This Privacy Policy ("Policy") explains the privacy practices employed by the Company in providing the Service (as they defined in the Client Agreement) to its customers (collectively "**Client**" and/or "**You**") and shall be read in the light of the Client Agreement held between the parties.
- 1.3. The Client's privacy is important to the Company, therefore the Company shall treat all data collected by, or transmitted to, the Company with care, in particular, personally identifiable information, and this Policy describes how, when, and why the Company shall collect such information. "Personally identifiable information" (or "Personal Data") means any information that may be used, either alone or in combination with other information, to personally identify, contact or locate any employee, representative and third party associated with the Client (collectively referred as "User"). Personal Data includes, but is not limited to, a first and last name, ID numbers, financial data (including deposits, withdrawals, and credit), email and physical addresses, and other contact information. Any information that does not enable identification, location, or contacting of the User, such as aggregated information, is "Anonymous Information", and the Company may Process (defined below) Anonymous Information in any way it so chooses without prior notice the Client.
- 1.4. References in this document to "Personal Data" are references to personal data and sensitive personal data as defined in Processing of Personal Data and where you are a corporate entity, shall include personal data and sensitive personal data of any of your directors, employees, officers, agents or clients.
- 1.5. References in this document to "Associate" are references to an undertaking being a member of our Group, a representative whom we or another undertaking of our Group appoint, or any other person with whom we have a contractual, agency or other relationship that might reasonably be expected to give rise to a community of interest between us and them.
- 1.6. References in this document to "Group" are references to the Company's and any entity controlled by or controlling the Company and entities under common ownership and control with the Company where "control" means direct or indirect control, of at least 20% of the voting rights or capital of an undertaking;
- 1.7. When collecting, processing and storing Personal Data provided by you, we are subject to the provisions of the Regulation of Electronic Communications and Postal Services Law of 2004 and the General Data Protection Regulation (GDPR) (EU) 2016/679 effected as from the 25th of May 2018.
- 1.8. Please read this Policy carefully. By accessing the Services, you agree to be bound by the Policy below. If you do not agree to the Policy below, do not use the Services.

2. CONSENT, NOTIFICATION AND MODIFICATION

- 2.1. By accepting and/or using (collectively, “**Using**” or “**Use**”) the Service, the Client express his consent to such collection, processing, storage and use of Personal Data by the Company, our Associates or Third Parties in accordance with the provisions contained herein, and agree that processing and storage of Personal Data provided to the Company by the Client may be carried out in or from any jurisdiction within or outside of the European Union including in or to countries or territories which do not offer the same level of protection of Personal Data as is enjoyed within the European Union. If the Client does not agree to the terms and provisions of this Policy the Client shall not Use the Service.
- 2.2. In addition, as a recipient of our Service, the Client commits to provide appropriate notice of its privacy practices to, and obtain the necessary permissions and consent from any User whose Personal Data is collected, received, used, and/or disclosed (collectively, “**Process(ed)**”) by the Company.
- 2.3. The Client further represents and undertakes that where it is a non-physical person providing to us Personal Data of any individual or where the Client is an individual providing the Company with Personal Data of any individual other than the Client, by opening an account with the Company, thereby undertakes and represents that such person, whose Personal Data is collected, stored and processed in accordance with the provisions contained herewith, has been informed of and has given their consent to such collection, storage and processing of their Personal Data in accordance with the provisions contained herein and that they have been informed of their rights in relation to their Personal Data which is held and processed in accordance with the provisions contained herein.

3. COLLECTION AND RECEIPT OF INFORMATION

- 3.1. We, our Associates, any persons deriving rights from us or our Associates, any members of our Group, agents or sub-contractors which we engage or work through for the purpose of collecting, storing and processing Personal Data and any third parties acting on our or their behalf (“**Third Parties**”) may collect, process use and store Personal Data provided by you for the purposes of, or related to, carrying out the transactions and other services which we provide to you, operational support and development of our or their businesses, providing us or them with professional or other services, in enforcing our or their contractual or other rights, and for the purposes of enabling compliance with the contractual, legal and regulatory provisions anywhere in the world to which we or our Associates and Third Parties are subject.
- 3.2. This occurs due to the fact that, as part of the Service, the Company may use hosting services for some or all of the Services, resulting in Personal Data being routed to the Company from its production servers. The Company also collect and receive Personal Data relating to Users for the purposes of communication with the Company and the general provision of the Service.

3.3. The Company collects the necessary information required to open, transact and safeguard the Client's assets and privacy and to provide Client with the services require. To this end, The Company gathers information from the Client and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources, which help us profile Client's requirements and preferences and provide better services to its Clients.

3.4. The information Company collects, may include among others:

3.4.1. Application information

- a) Personal information Client provides to the Company in its application form, such as name, address, date of birth, email address, income source etc. in order to facilitate the evaluation of Client's application. The information provides is also used for the purposes of communicating with the Clients.

3.4.2. Transaction information

- b) Information about the anticipated volume and value of Client's transactions with us and income information provided in order to enable the construction of Client's economic profile.

3.4.3. Verification information

- c) Information necessary to verify Client's identity, such as an identification card, passport or driver's license. This also includes background information We receive about the Client from public records or from other entities not affiliated with the Company.
- d) The Company's provider may also use "cookies" and other tracking technologies to collect Anonymous Information. A "cookie" is a small text file that may be used, for example, to collect information about the User's activity in relation to the Services and it may serve to recall Personal Data previously indicated by a User, such as his/her user ID and password for access to the Service(s).
- e) In particular, the Company's providers might be using "Flash Cookies" and/or local storage technologies to help users access the Client's accounts seamlessly and save their account settings to their browsers. Do note that most browsers allow controlling cookies, including whether or not to accept them and how to remove them.

4. USE AND DISCLOSURE OF PERSONAL DATA

4.1. The Company only uses and/or discloses the Personal Data of Users for purposes or reasons that are relevant or germane to the provision of the Service.

4.2. The Company may use and/or disclose Personal Data or any information submitted via the Service if The Company has a good faith belief that such use or disclosure is helpful or reasonably necessary to (i)

comply with any applicable law, regulation, legal process or governmental request, (ii) enforce the terms and conditions of our services agreement with You, including investigations of potential violations thereof, (iii) detect, prevent, or otherwise address fraud or security issues, or (iv) protect against harm to the rights, property or safety of the Company, its affiliates and shareholders, the Client, Users or the public.

5. SECURITY

- 5.1. The Company takes reasonable precautions to protect Personal Data from loss, theft, misuse, unauthorized access or disclosure, alteration, or destruction. Any personal information the Client provide Us will, be treated as confidential and shared only within the Company's and its Associates and will not be disclosed to any third party except under any regulatory or legal proceedings.
- 5.2. The Company employ physical, electronic, and procedural safeguards to protect Personal Data and it does not store Personal Data for longer than necessary to provide the Service or as permitted by law.
- 5.3. All Personal Data collected or received is transmitted to the Company in encrypted format.
- 5.4. The Company's datacenter(s) contain both internal and external servers. Access to the Company's internal server is restricted to pre-approved persons, servers and locations; our external servers can be accessed via the Internet.

6. COLLECTION BY THIRD PARTIES

- 6.1. The Company may transfer Personal Data to third parties for the purposes described in Section 5 above. In such cases, the Company make commercially reasonable efforts so that such third parties either: (i) subscribe to privacy standards substantially similar to this Policy or agree in writing to commit to such standards; or (ii) are bound by laws providing at least the same level of privacy protection as contained in this Policy.
- 6.2. The Company may disclose Personal Data to third parties for the purpose of performing statistical analyses of data in aggregated and anonymized formats.

7. ACCESS RIGHTS

- 7.1. Because the Company Process Personal Data as a Service provider to the Client, and because the Company might not maintain a direct relationship with any particular User, the Client shall held responsible for providing its Users with access to review the Personal Data held about them, allowing them to correct, amend, or delete any such information which is inaccurate or incomplete. Users should direct any questions and complaints to the Client and in any case not the Company.
- 7.2. The Client has a right, upon request, to be provided with information as to its Personal Data which the

Company holds and which is subject to processing as well as to request copies of documents with its Personal Data where this is not disproportionately burdensome for the Company.

- 7.3. Client has the right to request, and be provided with the following:
- a) Information regarding all Personal Data of the Client which We hold and which has been subject to processing as well as information as to how such data was obtained, the purpose for which the data is processed, the recipients, the categories of data processed or to be processed, the processing which has taken place since the data subject was last updated regarding the processing and the rationale behind the automated processing system;
 - b) Any correction and deletion of Personal Data which has not been processed in accordance with the applicable requirements due to lack of information or discrepancies;
 - c) Any notification made to any Third Party as to any amendments made in accordance with (b) above, unless this would be disproportionately burdensome for the Company.
- 7.4. Where the Company does not provide Client with a reply within 4 weeks of its request, Clients has the right to submit a complaint.
- 7.5. We note that the Company may refuse to provide Client with information in accordance with the provisions of this paragraph where in doing so would jeopardize the investigation or adjudication of criminal proceedings or where this would jeopardize political, financial and fiscal stability.
- 7.6. Where Client requests information in accordance with the provisions of this paragraph, the Company may impose a reasonable fee in respect of the cost in providing such information and/or documentation. Where a request for amendment of Client's Personal Data is well founded, the Company will return to the Client any fees paid in connection with this and will provide Client with a copy of the amended record of its Personal Data, free of charge.

8. RIGHT TO OBJECT TO THE PERSONAL DATA WHICH WE HOLD

- 8.1. You have the right to oppose the processing of your Personal Data where this is imperative and for legitimate purposes which are directly related to your personal circumstances.
- 8.2. Your right to object to the processing of your Personal Data, in accordance with the above, must be exercised in writing. We may accept any such request or we may reject it providing reasons for such rejection. In the case of our failure to reply or our rejection of your request, you may submit a complaint to the Data Protection Commissioner of Cyprus in relation to such rejection.
- 8.3. The processing of your Personal Data by the Company is essential in order for Us to be able to provide You with services and enter into transaction with You, as well as for the purposes of compliance with the legal and regulatory obligations to which we are subject. As such, although You are not required to provide the Company any of the Personal Data that We may request, please note that failure to do so could result in not being able to provide you with the service you require.

- 8.4. Whilst we attempt to ensure that all the information we hold about you is current, accurate and complete, we urge you to immediately contact us if any of your personal details have changed.

9. CHILDREN'S PRIVACY

- 9.1. The Service is not structured to attract individuals under eighteen (18) years of age (“**Children**”).
- 9.2. The Company does not Process Personal Data of Users it actually knows to be Children.

10. MERGER, SALE, CHANGE OF CONTROL, OR BANKRUPTCY

- 10.1. In the event that the Company is acquired by, or merged with a third party, or undergoes a change of control, the Company reserve the right to transfer or assign the Personal Data it had collected or received to the transferee or assignee, and such information will become subject to the privacy policy of the transferee or assignee.
- 10.2. Should such a sale or transfer occur, the Company will use reasonable efforts to direct the transferee or assignee to use the Personal Data in a manner that is consistent with this Policy. In the event of our bankruptcy, insolvency, reorganization, receivership or other similar occurrence, the Company may not be able to control how the Personal Data held by us is treated, transferred, or used.

11. REGULATORY DISCLOSURE

- 11.1. The Company reserves the right to disclose Personal Data to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings.
- 11.2. Such disclosure shall occur on a ‘need-to-know’ basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, The Company shall expressly inform the third party regarding the confidential nature of the information.
- 11.3. The Client acknowledges and accepts that the Company is required to disclose information in relation to any US reportable persons to the relevant authorities, in accordance with the reporting requirements of FATCA but any other reportable person in accordance with the CRS. The Client may contact the Company for additional information.

12. PRIVACY POLICY UPDATES

- 12.1. The Company reserves the right, in its discretion, to update this Policy at any time, which change shall be effective following the posting of the changed Policy on the Company's website, and the Client's continued Use of the Service shall constitute consent to the terms and provisions of the changed Policy.
- 12.2. Any dispute over our Privacy Policy is subject to this Privacy Policy and the Company's Terms and

Conditions. The Company encourages clients to check back and review this Policy so that Client always know what information the Company collects, how this is used and to whom We may disclose it.

13. FURTHER INFORMATION

- 13.1. Any inquiries, questions or concerns regarding Company's privacy practices or this Privacy Policy, may be addressed to: cfdwg.fze@gmail.com.