Sun Capital Markets Ltd

PRIVACY POLICY

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AMBITION MEETS EXECUTION

1. About Sun Capital Markets Ltd

Sun Capital Markets Ltd is a Company incorporated and registered under the laws of Seychelles with Company number 8431497-1. The Company is licensed and regulated as a securities dealer by the Financial Services Authority under license number SD145.

2. Applicable Regulatory Framework and Purpose of this policy

This Privacy Policy is formulated in compliance with the **Data Protection Act 2023 (DPA 2023)** and the **Financial Consumer Protection Act 2022 (FCPA 2022)**. The DPA 2023 aims to protect individuals' rights regarding the processing of personal data, recognizing the right to privacy under Article 20 of the Constitution.

The purpose of this policy is to outline the collection, use, processing, sharing, and protection of personal data received from consumers in accordance with the principles of data protection including lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, integrity, and accountability.
The Company is responsible for the protection of privacy and the safeguarding of clients' personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information as explained below.

3. Collection of Personal Data

During the account opening process for a demo or a trading account, the client is requested to provide the Company with personal information necessary for identity verification and compliance with applicable laws and regulations governing the provision of the services. The same information will also be used by the Company to contact the client regarding the offered services.

This may include biometric data, financial data, and other sensitive personal data, as defined under the DPA 2023

For further information on the non-public or sensitive data collected by the Company please refer to Section 3,4 and 7 of the Company's ***Confidentiality Policy.***

4. 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.

In view of the above, the Company may use client's personal information for one or more of the following purposes:

- to confirm/verify the identity of a consumer
- to process transactions
- trading account management
- for internal business as well as record keeping purposes
- to analyse statistical data
- to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation
- to defend possible legal claims and/or comply with court orders, judicial processes and or any other requirements of a competent authority

The Company also needs to comply with the Anti-Money Laundering regulations therefore there are documents that must be kept to be able for the Company to demonstrate to the authorities that have acted in accordance with the legislation.

If there is no lawful basis for the usage of client's personal data as indicated above, the client's consent will be required.

For further information on the purpose for which non-public consumer data is collected and used by the Company please refer to Section 5 of the Company's ***Confidentiality Policy.***

5. Sharing and transfer of Personal Information

The Company may share client information with business partners and suppliers with whom it may have outsourced certain of the Company's business functions or cooperating with. In order to provide services to the client the Company may be required to transfer client's personal information to parties located outside of Seychelles i.e. in the European Economic Area or in countries which may not have an equivalent level of data protection laws as in the Seychelles. Where this is the case the Company will take reasonable steps to ensure the privacy of the client's information, as required under Section 47 of the DPA 2023. By submitting personal information, the client agrees to the aforesaid transfer, storage and processing of the client's information.

The Company may also share information with affiliates or any other company in the same group of the Company in the event such information is reasonably required in order to provide the products or services to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so. In cases where clients have been introduced by a third party such as a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

The Disclosure of consumer data should be in line with Section 9 of the Confidentiality policy of the Company. The client that has established a business relationship with the Company voluntarily consent to the disclosure of their non-public consumer data electronically in the form of a general agreement through the acceptance of the client services agreement at the stage of creating their account.

5.1 Data Subject Rights

Under Part V of the DPA 2023, clients have the following rights:

- Right to be informed about the collection and processing of their personal data
- Right of access to personal data held by the Company
- Right to rectification or correction of inaccurate or incomplete data
- Right to deletion (Right to be forgotten)
- Right to object to processing for specific purposes
- Right to data portability
- Right to compensation for material or non-material damages resulting from unlawful data processing

Clients can exercise these rights by submitting a request to [EMAIL].

5.2 Data Security and Breach Notification

The Company shall implement appropriate technical, organizational, and physical security measures to protect personal data from unauthorized access, loss, alteration, or destruction.

In case of a personal data breach, the Company will notify the Information Commission within 72 hours, as required under Section 43 of the DPA 2023. If the breach poses a high risk to the rights and freedoms of clients, affected individuals will also be informed promptly.

5.3 Data Retention

Personal data shall be retained only as long as necessary to fulfill the purpose for which it was collected. Once the retention period expires, data will be anonymized, archived, or securely erased, following Section 16 of the DPA 2023.

The Company adopts data minimization principles, ensuring that only the minimum necessary personal data is processed.

6. Cookies

The Company uses cookies to gather information about the client's access to the Company's website https://www.supremefxtrading.com/ and other services the Company provides to the client.
The Company may share web site usage statistics with reputable advertising companies and with its affiliated companies. It is noted that the information collected by such companies is not personally

identifiable. To administer and improve the services offered by the Company's website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Most internet browsers are set up to accept cookies. If the client does not wish to receive cookies, he/she may be able to change the settings of the browser to refuse cookies or have the choice whether to accept a cookie or not. However, it is strongly recommended that the client allows cookies on the Company's website to ensure he/she has the best possible experience. Turning off cookies may result in reduced performance of the website and trading platform and may also impair the quality of the services that the Company provides in relation to the client's trading account.

7. Amendments to Policy

The Company reserves the right to make changes to this Privacy Policy from time to time for any reason and the client will be notified of such changes by posting an updated version of this Privacy Policy on the website. The client is responsible for regularly reviewing this Privacy Policy and the use of this website after any such changes are published, shall constitute an agreement to such changes.

8. Legal Disclaimer

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 client's personal information due to misuse or misplacement of any passwords, negligent or malicious.

9. Communication with the Company

Further information on the Company's Privacy Policy is available upon request. The Company's contact details are:

Email: support@supremefxtrading.com
Address: CT House, Office 4E, Providence, Mahe, Seychelles