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# Aerarium Limited Privacy Policy

Version 4 - August 2021

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**1. INTRODUCTION**

This Privacy Policy sets out the way Aerarium Limited (hereinafter “the Company” and/or “we”) collects, uses and manages the personal information received from its visitors, active and/or potential clients who have terminated their business relationship with the Company who are accessing

or using the Company's website(s) and mobile applications.

The Company is committed to safeguard the confidentiality of your personal information or data it collects, uses and/or holds in accordance with the applicable data protection laws and regulations.

The Company has established technical and other organizational measures and procedures as appropriate in order to safeguard and protect your information and privacy.

By accessing Company's website and by providing personal data and/or confidential information as per the applicable data protection laws and regulations and as per the provisions of this Privacy Policy, the Client accepts to be bound by the Company's Privacy Policy.

## **2. COLLECTION OF PERSONAL DATA**

During the account opening process for a demo or a trading account, the client is requested to provide to the Company some personal information. The provision of the information submitted by the Client will enable the Company to evaluate the application pursuant to the 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.

The Personal Data collected by the Company might include but are not limited to: the client's name, surname, address, e-mail address, phone number; date of birth, gender, nationality; occupation and employment details; financial information such as income, assets and net worth, source of funds; tax relevant information; IP address and other location data; bank account information, e-wallets and credit card details; documents that the client has to provide for verification of its identity, such as passport/identity card, utility bills and/or bank statement and historical data of client's transactions including, trading history or investments company incorporation details and other supporting documents if the applicant is a legal entity.

## **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.

In view of the above, the Company may use client's personal information for one or more of the following purposes to confirm/verify its identity; 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 has 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.

#### **4. 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 EU. Where this is the case the Company will take reasonable steps to ensure the privacy of the client's information. 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 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.

## **5. DISCLOSURE OF PERSONAL DATA**

The Company shall not disclose to a third party, any confidential information unless it is required to do so by a regulatory authority of a competent jurisdiction, the provisions of applicable laws and regulations, there is a legitimate interest for such disclosure or duty to do so the client has requested from the Company to proceed with a disclosure and/or the client has consented to; such disclosure shall occur on a 'need-to know' basis, unless otherwise instructed by a regulatory authority. Provided that such disclosure takes place, the Company shall expressly inform the third party regarding the confidential nature of the information.

## **6. COOKIES**

The Company uses cookies to gather information about client's access to the Company's website 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 behavior 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.

Contact Details:

E-mail: [dpo@axianceint.com](mailto:dpo@axianceint.com)

Address: CT House, Office 9A, Providence, Mahe, Seychelles.



