

VALETAX INTERNATIONAL LIMITED

Privacy Policy

License No. GB21026312

Regulated By:
Financial Services Commission of Mauritius

AUGUST 2023

1. INTRODUCTION

VALETAX INTERNATIONAL LIMITED (hereinafter the "Company", "us", "our" or "we"), whose head office is at 6 St Denis Street, 1/F River Court, Port Louis, 11328, Mauritius is authorized and regulated by the Financial Services Commission of Mauritius (FSC), with Investment Dealer (full service Dealer excluding underwriting) License No: GB21026312.

The Company needs to collect and use the personal data of its existing and potential active and terminated clients and other individuals who are accessing or using the Company's website(s) and any mobile application(s) and come into contact with the Company.

This Policy applies to existing and potential active and terminated clients and other individuals who are accessing or using the Company's website(s) and any mobile application(s) and come into contact with the Company.

In collecting and using personal data, the Company is committed to protecting an individual's right to privacy with regard to the processing of personal data, therefore this Privacy Policy (hereinafter the "Privacy Policy") is hereby adopted to support this commitment.

The Privacy Policy ensures that:

- The Company protects the rights of individuals related to the Company
- The Company is open about how it collects, uses, storage, access, discloses, transfers and destroys individual's data
- The Company takes protective measures against the risks of a data breach

The Company respects and values your data privacy rights and makes sure that all personal data collected from you are processed in adherence to the general principles of data protection as set out in this Privacy Policy. In accordance with these principles, the personal data shall be:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss,

destruction or damage.

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

2 PROCESSING OF PERSONAL DATA

2.1 Lawfulness of processing of personal data

The lawfulness of collection and processing of personal data by the Company is based on the following lawful basis:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- the necessity to comply with its legal obligations;
- for the performance of a contract to which is a party or in order to take steps at the request of a prospect client prior to entering into a contract;
- for the Company's legitimate interests.

By providing your personal data during the Account opening process or by any other means, you agree to have your personal data processed, use and transfer as described in this Privacy policy and you provide your expressed consent to the collection, systemization, aggregation, storage, updating, changing, usage, anonymization, blocking, deletion, distribution and transfer of said personal data to third parties in accordance with the conditions set forth in this Privacy Policy.

2.1.1 Collection of personal data of clients and other individuals

In order to receive more information, register for a demo account, open a trading account with the Company or for any other business relationship, you are requested to complete the Account opening form. By completing the Account opening form and providing your personal information, you enable the Company to evaluate the application and comply with the relevant 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 Company collects sufficient evidences and information of potential clients and other individuals for their identity verification process, subject to its legal obligations.

These evidences and information may include:

- Name, surname, address, telephone number, email address and fax number if exist,
- Date of Birth,
- Gender,
- Citizenship,

- Nationality,
- Certified and translated copy of passport, ID or other identification document,
- Original or certified and translated copy of the proof of address (i.e. utility bill and/or bank statement),
- Tax information,
- CV,
- Bank Reference,
- Information on profession or occupation,
- Name of employer, if exist,
- Information about economic profile (e.g. size of wealth, source of wealth, income source),
- Trading history,
- Information about your knowledge and experience in trading in financial instruments,
- FATCA and CRS information,
- Details about Bank account(s), e-wallets and credit card,
- Non-Bankruptcy Certificate,
- Clean Criminal Record,
- Constituent letter,
- Reference from previous employers,
- IP address and other location data.

The Company may collect additional personal data for its clients under its legal obligation, update the personal data that processes and collect other additional personal data under any new legal requirement the Company is subject, as well as, personal data information not obtained from the data subject.

In case a potential client has not become a client of the Company, the Company shall destroy his/her Personal data the soonest.

2.2 Use of personal data of clients and other individuals

The Company applies security measures for the protection of the personal data in use. The Security measures include technical and organisational procedures.

The Company restricts access to personal information to employees who need to know the specific information in order to operate, develop or improve our services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

Personal data collected shall be used by the Company for the client's identity verification process subject to its legal obligations and to decide for the establishment or not and the continuation of a business relationship with the client.

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 and/or comply with court orders judicial processes and or any other requirements of a competent authority;
- to comply with the relevant anti-money laundering compliance framework;
- To comply with our legal obligations;
- for risk management purpose.

2.3 Storage of personal data

The Company applies relevant measures to protect the personal data that processes against any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access as well as against any other unlawful processing.

The Company keeps personal data physically/on paper and/or electronically.

2.4 Disclosure of Personal Data

Personal data under the custody of the Company shall be disclosed only pursuant to a lawful purpose and to authorised recipients of such data. Authorised recipients may include third parties with whom the Company has a contractual agreement for the provision of a service and shall refer as partners of the Company.

The Company's partners maintain the privacy of your information to the same extent the Company does in accordance with Company's Privacy 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 any applicable Law.

Recipients of Personal Data may be for example:

- technological experts that appointed by the Company to support the smooth operation of Company's systems;
- platform providers;
- Financial institutions/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 in order the Company to be able to meet its regulatory obligations;
- any authority to which the Company is required to disclose such information by Law;
- external consultants and outsourced functions' providers;
- any third parties where this is necessary to process a transaction or provide services which you have requested;
- authentication service providers to perform identity checks and documents verification;
- Data Protection Officer in case the Company decides to be outsourced.

2.5 Transfer of personal data

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 Mauritius 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.

2.6 Destruction

After the storage period, as defined below under the paragraph "3. For how long the Company keeps your personal data", is ended, the Company will destroy hard copies of personal data and personal data that are kept electronically.

3 FOR HOW LONG THE COMPANY KEEPS YOUR PERSONAL DATA

The Company will keep personal data for no longer that is necessary for the purposes for which the personal data is processed. The Company will keep personal data of clients during the time of business relationship.

In accordance with the Company's legal obligations, at the time the business relationship of the Company with the client is terminated, the Company will keep client's personal data for a period of at least seven (7) years, which is calculated after the termination of the business relationship. The Company may keep personal data for longer than seven (7) years in cases where the personal data cannot be deleted for legal, regulatory or technical reasons.

4 SUBJECT TO CONSENT

In case the process of personal data requires your consent, such consent will be provided in accordance with the express written terms which govern the Company's business relationship with you, as amended from time to time, or any other contract the Company may have entered into with you or as set out in Company's communication with you from time to time.

5 PROCESSING FOR OTHER REASON

The Company will ask to receive data subject's consent in any case will process data subject's personal data for a purpose other than that for which personal data have been collected as defined in this Privacy policy.

6 DATA SUBJECTS RIGHTS

All individuals who are the data subject of personal data held by the Company are entitled to the below

rights:

- **Right of access.** You have the right to request a copy of your personal data which the Company holds about you. The Company will provide a copy of your personal data that is undergoing processing. For any further copies requested by you, the Company may charge a reasonable fee based on administrative costs.

You can send an email to info@valetax.com asking for a copy of your personal data that is undergoing processing.

- **Right to rectification.** You have the right to request from the Company to rectify any inaccurate personal data concerning you.
- **Right to erasure.** You have the right, under certain circumstances, to request from the Company the erasure of your personal data. In case that these circumstances apply to your case and provided that no exception to this obligation applies the Company acting as your controller will erase your personal data from its records.
- **Right to restriction of processing.** Where there is a dispute in relation to the accuracy or processing of your personal data, you have the right to request a restriction on further processing.
- **Right to data portability.** Where the processing is based on consent or on a contract and the processing is carried out by automated means, you have the right to receive the personal data and have the right to transmit those data to another controller.
- **Right to object.** You have the right to object on grounds relating to your specific situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (pursued by us or by a third party) and there is something about your specific situation which makes you want to object to processing on this ground as you consider it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Right not to be subject** to a decision based solely on automated processing, including profiling.
In cases the Company will use automated processing (e.g. through automatic profiling / appropriateness test), for a decision concerning you or significantly affects you, you can request not to be subject to such a decision unless the Company can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and the Company. Even if a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention. We may not be able to offer our services or products with you, if we agree to such request (i.e., end our relationship with you).
- **Right to withdraw your consent.** Where the processing is based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent, send an email to info@valetax.com asking to withdraw your consent. However, the withdrawal of your consent

will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **Right to lodge a complaint** with a competent authority. In such case, the company asks the data subject in the first instance to contact the Company at the email info@valetax.com.

The Client can exercise any of the above rights by contacting the Company through email at info@valetax.com or by post at postal address: 6 St Denis Street, 1/F River Court, Port Louis, 11328, Mauritius.

The requested information will be provided free of charge. The Company reserves the right to charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on the request, if in case your request is manifestly unfounded or excessive.

7 RECORDING OF TELEPHONE CONVERSATIONS AND OF ELECTRONIC COMMUNICATION

The Company records, monitors and processes any telephone conversations and/or electronic communications between the Company and you. All such communications are recorded and/or monitored and/or processed by the Company, including any telephone conversations and/or electronic communications that result or may result in transactions or your order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes.

8 LINKS TO OTHER WEBSITES

Company's website may provide links to third-party websites for product related services and information. If you decide to access those links, you will leave the Company's website. The Company does not control those third-party websites. Any personal information you may give to unrelated third-parties is not covered by the Company's Privacy Policy. You should carefully review the privacy policy of any third-party website before submitting any personal information. Some third-party companies may share their personal data with the Company. That sharing is governed by the disclosing company's privacy policy.

9 COOKIES

Cookies are small text files created by the websites you visit or by certain emails you open and are placed on your computer or other devices. Cookies are used to track, save and store information about the user's interactions and usage of the website in order to improve the user experience, enable functionality on the website, facilitate site security and provide the business with marketing information about the website's visitors. Cookies generally can easily be viewed and deleted and are harmless and serve crucial

functions for websites.

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.

We may enlist outside organizations to help us manage the website and collect and analyze statistical data. These outside organizations may install and use their own cookies on our behalf.

For more details about the use of Cookies by our Company, please refer to our "[Cookies Policy](#)".

10 BREACH AND SECURITY INCIDENTS

Breach of security leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. The Company is responsible for ensuring immediate action in the event of a security incident or personal data breach.

The Company shall comply with the provisions of the relevant legislation in case of a breach. In case of a breach the Company will notify you and the relevant competent regulator, if applicable, where the Company is legally required to do so.

11 COMMUNICATION WITH THE COMPANY

For any inquire relevant to the processing of personal data and any further information on Company's Private Policy, the data subject may contact the Company at:

Address: 6 St Denis Street, 1/F River Court, Port Louis,
11328, Mauritius Email: info@valetax.com
Tel: (230) 460 0473/4

For any type of inquiry or complaint, the Company may request the provision of additional information necessary to confirm the identity of the data subject who makes the request or complaint.

We will try to respond to your inquiry without undue delay and in any case within thirty (30) days of receipt of the inquiry. In case that your inquiry takes us longer than thirty (30) days we will notify you accordingly and keep you updated. It should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. However, where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either:

- (a) charge a reasonable fee taking into account the administrative costs of providing the information

- or communication or taking the action requested; or
(b) refuse to act on the request.

12 VALIDITY & AMENDMENTS TO THE POLICY

This Privacy Policy is effective this 12 day of May, 2022, until revoked or amended by the Company.

The Company reserves the right to change or amend this Privacy Policy without further notice to you, provided that the changes do not significantly reduce your rights under this Privacy Policy. If the Company makes material changes to this Privacy Policy, the Company will notify you by email or by means of a Policy on the Company's website 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 Privacy Policy will at all times be available at www.valetax.com. Any revised Privacy Policy will be effective immediately upon posting on the Company's 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.

13 LEGAL DISCLAIMER

The Company reserves the right to disclose your personal data as required by applicable legislation 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 data resulting from cookies on the Company's website, or otherwise, 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 data due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or by a person authorized by you (whether that authorization is permitted by the terms of our agreement with you or not).