



PRIVACY POLICY

OF VANEX LIMITED

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## 1. Overview

Vanex LIMITED (the "Company" or "Vanex") places a high priority on the privacy and integrity of the personal information of our Customers, both present and future. The Company strives to ensure the safety and confidentiality of all information received from the Customer. This Privacy & Internal Privacy Controls Policy (the "Policy") describes how the Company collects, uses and protects the personal information of the Customer.

## 2. Privacy Policy & Policy on Internal Policy Controls

The Company routinely collects personal, confidential and sensitive non-public information ("Non-Public Information") from its Customers. The Company is committed to safeguarding this information so that its confidentiality can be maintained and unauthorized access, use or disclosure of this information can be prevented. If the Customer does not want the Company to use the Non-Public Information the Customer should inform the Company in writing by sending an email or a letter by registered post at the registered office of the Company. Should the Customer wish to opt out, the Company may not be able to continue providing information, services and products requested by the Customer and the Company shall have no liability to the Customer in respect of the same.

The Company will not use or disclose Non-Public Information for any purpose other than for the performance of business activities or if required by law.

This Policy describes how VANEX protects and handles the Non-Public Information it collects on customers who apply for or receive its products and services. The provisions of this policy apply to current, former and prospective customers of VANEX.

## 3. Retention of Records

VANEX will keep personal data only as long as it is necessary, including for the purposes of updating the product or services or as required by law. When the personal data is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorised parties from gaining access to the information during and

after the process.

We will safeguard information in our custody.

We have developed and will maintain security procedures to safeguard personal data against loss, theft, copying and unauthorised disclosure, use or modification. Access to personal data is restricted to employees and authorised service providers who need it to perform their work.

#### 4. Cookies

What are cookies? Cookies are small pieces of information sent by a web server to store on a web browser so it can be read back later from that web browser. Cookies may be used on some pages of the Site for us to provide Site users with a more customized web browsing experience.

#### 5. The Protection of Non-Public Information

The Company takes the issue of security very seriously and ensures that all possible measures to ensure the safety of your confidential information, including adhering to strict standards for the internal use of confidential information and using leading data storage technology.

When making a payment with a credit/debit card, the client will be transferred to the site of the processing centre where a form has to be filled. To prevent the unauthorized use of your credit/debit card, the card information of the client is transmitted to the Company in shortened form and through a secure server. In certain exceptional circumstances, the Company may refund payments made by credit or debit card. In this case, the funds will be refunded to the card that was used for the deposit.

The Company may occasionally share Non-Public Information with its affiliates or third-party service providers and joint marketers not affiliated with VANEX. This information may be shared for a variety of purposes, such as to support the financial products and services provided to customers, to service customer accounts, to cooperate with regulatory authorities and law enforcement agencies, to comply with court orders or other official requests, or, as necessary, to protect the Company's rights or property.

By accepting the Customer Agreement, the Customer consents to the Company collecting, maintaining, using and disclosing their Non-Public

Information in accordance with the terms of this Policy.

## 6. Your Consent

By accessing our Site, you consent to VANEX collecting, maintaining, using and disclosing your Personal Data in accordance with this privacy policy.