

Trade Smart, Trade Secure

PRIVACY POLICY

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secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most information retention periods.

- The information subject's consent for a longer retention period. If so, we will retain
 information in accordance with the consent.
- Pipze Market Limited is subject to a legal, contractual, or similar obligation to retain the
 information. Mandatory information retention laws including AML/CFT regulations can be
 applied in the applicable jurisdiction, government orders to preserve information relevant to
 an investigation, or information that must be retained for the purposes of litigation.

Use of Cookies

We use cookies to assist us in securing your trading activities and to enhance the performance of our Website. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information, nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.

We may share Website usage information about visitors to the Website with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you've visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve our Website, we may use a third party to track and analyze usage and statistical volume information including page requests, form requests, and click paths. The third party may use cookies to track behaviour and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

Changes to this Privacy Policy

From time to time, we may update this Privacy Policy. In the event we materially change this Privacy Policy, the revised Privacy Policy will promptly be posted to the websites and we will post a notice on our websites informing you of such changes. You agree to accept posting of a revised Privacy Policy electronically on the website as actual notice to you. Any dispute over our Privacy Policy is subject to this notice and our agreement with you. We encourage you to periodically check back and review this policy so that you will always know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact us.

Privacy policy

Pipze Market Limited is registered in Saint Lucia as an International Business Company with the registration number 2025-00182

Pipze Market Limited is authorized and regulated by the Saint Lucia. Registered Address: Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

We provide our customers with foreign exchange contracts (FX) and contracts for differences (CFD) trading and related eWallet services from www.pipze.com

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By using our website, you agree to be bound by this privacy policy.

Privacy

We know that you are concerned with how we deal with your personal information. This privacy statement sets out our current policies and demonstrates our commitment to your privacy. Your further rights and our obligations in respect to collecting and dealing with your personal information are disclosed in the Privacy Act 1993.

Purpose of the Information processing

We are required to maintain certain personal information about individuals for the purposes of satisfying our operational and legal obligations (to open an account, transact business effectively and to safeguard your assets and your privacy). We recognize the importance of correct and lawful treatment of personal information as it helps to maintain confidence in our organization and to ensure efficient and successful outcomes when using this information.

Once you open an eWallet and trading account (-s) with us you provide your personal information to companies Pipze Market Limited. We collect your personal information to provide you with our services as specified in our Client Agreement, eWallet Terms of Use and other documents regulating our business relationship with you published at www.pipze.com.php We only use personal information as appropriate to provide you with a high quality of service and security. For example, we may use the information collected from you to verify your identity and contact information and to establish the business relationship with you. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. We also use your personal information to process and execute your trading orders. We also may use your personal information in order to receive or send payments to you / from you. In this case, we may share your personal information with external payment provider, which you use to process the payment to us / from us, for example: your bank, corresponding banking institution, payment services provider. All this information helps

us improve our services and inform you about new products, services or promotions that may be of interest to you.

Principles of the Information processing

All personal information is:

- 1. Fairly and lawfully processed;;
- 2. Processed for a lawful specified purpose;;
- 3. Adequate, relevant and not excessive;
- 4. Not kept for longer than necessary;
- 5. Processed in accordance with the individual's (data subject's) rights;
- 6. Secure;
- 7. Not transferred to other countries without adequate protection.

Personal Information We Collect

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website, in emails, by calls, in our live chat, support center;
- Up-to-date information about yourself, if you register your personal details to use our service;
- 3. Information you provide to us in the applications we ask you to fill in;
- 4. Details of your visits to our website, details of your emails, calls and requests sent through the live chat, support center from, including, but not limited to: traffic information, location information, weblogs and other communication information, the resources that you access, devices and services you use to contact us;
- Contact details, such as: email address, phone number, postal address, messengers and/or social networks ID;
- 6. Financial information: source of funds you deposit or intend to deposit to us, source of wealth, your balances with us;
- 7. occupation and name of employer;
- 8. Payment information: deposits and withdrawals amount, date of payment, banks and other payment institutions involved in the payment process;
- 9. Trading information: orders and their execution results;
- Technical information such as your IP addresses used to access our website and services, your activity logs in our systems.

Considering our obligations under respective AML/CFT regulations we also collect, process and keep the documents, which the customer provides to us to verify the personal information specified above. This include: passport, driving license and other ID copies, utility bills or other documents confirming the address of the customer, bank or other financial institutions statements, documents confirming source of funds and/or source of wealth etc. Please refer to www.pipze.com/privacy.php

We also collect the information about current, past and prospective clients and customers, website visitors, etc. with whom we have dealings. This information may include information required to communicate with you, including your name, mailing address, telephone number, email address and your location information.

We may also ask you for information when you report a problem with our website. If you contact us, we may keep a record of that correspondence. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

You have choices about the information we collect. When you are asked to provide personal information, you may decline. Subject to the provisions of this policy specified below, you are also entitled to have Pipze Market Limited erase your personal information, cease further dissemination of the information and potentially have third parties halt processing of the information. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. However, if you choose not to provide information that is necessary to provide a service or feature or to withdraw the information that is still relevant to original purposes of processing, you may not be able to use that service or feature.

The information we collect depends on the context of your interactions with Pipze Market Limited, the choices you make, including your privacy settings, and the service and features you use. Pipze Market Limited shall comply with the regulations applicable to the financial services providers, including AML/CFT regulations. As a result, we need to collect, process and keep your personal information to meet the applicable legislation requirements. Your refusal to provide us with the personal information in some cases may lead to freezing of your accounts with us and the funds held on such accounts. Under certain circumstances, we shall also report your activity and respective personal information to authorities.

We also collect the information about current, past and prospective clients and customers, website visitors, etc. with whom we have dealings. This information may include information required to communicate with you, including your name, mailing address, telephone number, email address and your location information.

Personal information may consist of information kept on paper, computer or other electronic media all of which is protected under the applicable law.

Your rights

As a data subject which provides its personal information to us you are entitled to:

Obtain from us an information whether your personal information is being processed by us.
 You may also access your personal information and request us to provide you with a copy of your personal information;

- Obtain from us without undue delay the rectification of inaccurate personal information.
 You also have the right to have incomplete personal information completed;
- 3. Subject to the information protection regulations applicable to you, you may request from Pipze Market Limited the erasure of your personal information without undue delay. The request shall be made on the legal grounds provided in the information protection regulations applicable to you, which include among other:
 - The personal information are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - You withdraw your consent on which the processing is based according to the
 provisions of the applicable to you information protection regulations and where
 there is no other legal ground for the processing;
 - You object to the processing pursuant to the applicable information protection regulations and there are no overriding legitimate grounds for the processing, or the information subject objects to the processing;
 - The personal information have been unlawfully processed;
 - The personal information have to be erased for compliance with a legal obligation in European Union or the law to which Pipze Market Limited is subject.

You should also pay an attention that being a financial services provider we shall keep a part of your personal information to comply with FATF recommendations, Anti-money laundering regulations of 2011, Statutory Rules and Orders No. 46 of 2011, Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and other applicable legislation. Your request to erase your personal information would not affect such part of the personal information.

- Subject to the information protection regulations applicable to you, you may request from Pipze Market Limited to restrict processing of your personal information in the following cases:
 - The accuracy of the personal information is contested by you, for a period enabling us to verify the accuracy of your personal information;
 - The processing of your personal information is unlawful and you oppose the erasure of your personal information and request the restriction of their use instead;
 - Pipze Market Limited no longer needs the personal information for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
 - You object to processing pursuant to the applicable information protection regulations pending the verification whether the legitimate grounds of us override yours.

- You shall be notified by us once any rectification or erasure of personal information or restriction of processing to each recipient to whom the personal information have been disclosed takes place;
- 3. Receive your personal information, provided to Pipze Market Limited, in a structured, commonly used and machine-readable format and you have the right to transmit those information to any third party. You may also ask us to transmit your personal information directly from Pipze Market Limited to other person in case such other person support the information formats and secure connections used by Pipze Market Limited to transmit such information;
- 4. Object, on grounds relating to your particular situation, at any time processing of your personal information. If you do so, Pipze Market Limited wouldn't process your personal information unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Such grounds include among other the responsibilities of Pipze Market Limited arising out of AML/CFT regulations;
- 5. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. However, we could do so if this is necessary for entering into, or performance of, a contract between us. We use an automated information system, which collects and process your personal information and make a pre-decision in respect to the entering into agreement with you or requests an additional information from you in order to execute our obligations under the agreement with you.

Reasons we share your personal information

We share your personal information with your consent or as necessary to complete any transaction or provide any service you have requested or authorized (debiting and crediting your accounts, executing your trading orders, providing support to you etc.).

In order to provide you with our services we share your personal information with our partners, vendors and service providers, including IT and software providers and vendors. We may also share your personal information with third persons and authorities if required by law, in respond to legal process, to protect our clients, to maintain the security of our services and to protect the rights or property of Pipze Market Limited.

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

We reserve the right to disclose your personal information to third parties when required to do so by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies. We may also disclose your information to non-affiliated third parties if it is necessary to protect Pipze Market Limited rights or property.

We share your personal information with the banks and payment institutions, which process your payments to/from us. Commonly, we share your name, address, contact details (email) and the amount of payment to/from you. Such disclosure is made solely to provide you with an ability to deposit withdraw funds to/from us.

We may share your personal information with third parties acting as our liquidity providers. Once we hedge your positions with external liquidity providers they may access the information regarding your trading orders, including types of derivatives traded, their amount.

Your personal information may be shared with our software vendors and IT services providers including trading platform providers (hereinafter – "IT vendors"). While providing Pipze Market Limited with software, its modifications, implementation and support IT vendors may have an access to our information systems from their systems and locations. As a result, some of your personal information depending on the system where they are kept may be disclosed to our IT vendors. We limit an access of such IT vendors to our information systems to the best of our abilities. However, the situation may arise that in the process of software maintenance (modification of software functionality, migrating information to the new software versions, fixing bugs etc.) the vendor and/or IT provider get an access to the databases where your personal information is stored.

Some of IT vendors act as our technology providers based on the software-as-a-service (SAAS) business model. In this case, Pipze Market Limited use their information systems installed on their hardware environment. Respectively, our databases may be kept on the servers of such vendors. In this case, we limit an access using integrated management rules, which restrict vendor's access to the information kept by its clients (Pipze Market Limited).

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, client service and support, client satisfaction surveys or other information collection activities relevant to our business. We may also provide a party with customer information from our database to help us to analyze and identify customer's needs and notify customers of product and service offerings. Use of the shared information is strictly limited to the performance of the task we request and for no other purpose.

According to the applicable law, we are required to upload your trading information (trading orders and/or positions) along with some of your personal information (name and/or UID) to the trading information depositories. We enter into agreements with the well-known international depositories, which provide a highest level of information security.

We may share information with affiliates and partners, including companies operating under Pipze Market Limited brand name, if the information is required to provide the product or service you have requested, or to provide you with the opportunity to participate in the products or services our affiliates and partners offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our customers. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful to yourself. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

All third parties receiving your personal information from us under the respective agreements are required to protect your personal information in a manner similar to the way we do this. We use a variety of legal mechanisms, including contracts, to help insure your rights and protections.

Restriction of responsibility

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Policy. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy provided by that third party.

Restriction of responsibility

All individuals who are the subject of personal information held by us are entitled to:

- 1. Ask what information we hold about them and why;
- Ask how to gain access to it;
- 3. Be informed how to keep it up to date;
- 4. Have inaccurate personal information corrected or removed;
- 5. To receive the personal information concerning them, which they have previously provided;
- 6. Prevent us from processing information or request that it is stopped if the processing of such information is likely to cause substantial, unwarranted damage or distress to the individual or anyone else, etc.;
- 7. Require us to ensure that no decision which significantly affects an individual is solely based on an automated process for the purposes of evaluating matters relating to him/her, such as conduct or performance;
- 8. Be informed what we are doing to comply with our obligations under the personal information protection laws.

If you cannot access certain information and personal information collected by Pipze Market Limited, you can always contact Pipze Market Limited by contact details as specified in this Privacy Policy. We will respond to requests to access or delete your personal information within 30 days.

Should you consider that your rights under this Privacy policy and/or applicable legislation are infringed by us and we didn't take all necessary actions to remedy such violation or rejected your claim you have the right to lodge a complaint with a supervisory authority and before the competent court.

Security of Personal Information

We maintain strict security standards and procedures with a view to preventing unauthorized access to your information by anyone, including our staff.

We use different organizational and technological measures to protect your personal information such as pseudonymisation and encryption. As a part of the pseudonymisation process when you establish a business relationship with us we assign to your accounts (both ewallet and trading account) the unique identifiers (UID) which make your personal information no longer be attributed to you without the use of additional information from our information system. Your UID instead of your name is used in most of the information systems we utilize to provide you with our services. Only a limited number of our staff and third parties have an access to the information system where your personal information in conjunction with UID is stored.

We use leading encryption technologies to secure your information on a hardware and software levels. The hardware protection includes Cisco security products. The software protection tools include strict control mechanisms as follows: SSL, TLS with keys larger than 2048-bit.

All <u>Pipze Market Limited</u> members, all our staff and third parties whenever we hire them to provide support services, are required to observe our privacy standards and to allow us to audit them for compliance.

Where Personal Information is stored and processed

Personal information collected by Pipze Market Limited may be stored and processed in your region or in any other country where Pipze Market Limited or its affiliates, subsidiaries or service providers maintain facilities. Typically, the primary storage location is in the European Union, with a backup to the information centers in other regions. The storage location(s) are chosen in order to operate efficiently, to improve performance, and to create redundancies to protect the information in the event of an outage or other problem. We take steps to ensure that the information we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable law wherever the information is located.

We transfer personal information to other countries. When we do so, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your information.

Retention of Personal Information

As a general rule, Pipze Market Limited retains your personal information for the whole period of the business relationship with you and 5 years from the termination of such relationship. However, the period of your personal information retention can vary for different information types in the context of different products; actual retention periods can vary significantly. The criteria used to determine the retention periods include, for instance:

 The period of information processing needed to provide the services. This includes such things as maintaining and improving the performance of those services, keeping our systems