

## **Privacy Policy**

At Wingo Group Ltd (hereinafter referred to as the "Company", "we", "us", "our"), we value our clients', visitors', their representatives', owners' personal information and are committed to keeping it safe and secure. This Privacy Policy outlines how we collect and protect personal information from individuals who use our products and services, or consider using them, while visiting or using our website, whether they are potential clients, current or former clients, their representatives, owners.

### **Overview**

We notify each client, visitor, representative, owner that his/her privacy is important to us. Maintaining the confidentiality of a person's personal data is a core principle of our entire business operations. This Privacy Policy also serves as a privacy notice, informing about why and how we collect and manage the personal data.

During the rendering of services/products, using our website, we gather, collect, and possess certain private information/personal data of clients, visitors, representatives, owners. This is why we would like to inform a person about the following Privacy Policy that is applicable to clients, visitors, representatives, owners while receiving or applying for any of our services/products, using our website.

Please note that this Privacy Policy is only applicable to websites directly maintained by the Company and not to the other entities or persons to whom we might refer through banners or links within our website.

If a person uses our services/products, visits our website, such person acknowledges that he/she have read and understood all of the terms and guidelines of this Privacy Policy. By using our services/products, visiting our website, a person expressly agrees to this Privacy Policy and expressly consents to and agrees to the processing of his/her personal data as set forth herein.

This Privacy Policy is governed, construed, interpreted, and enforced in accordance with the laws of Comoros, and the European Union. If any term of this Privacy Policy is found to be inapplicable or unenforceable under the law, it will have no effect on the application or

enforceability of the remaining elements of this Privacy Policy. If a person does not agree with this Privacy Policy, he/she should immediately stop using our website, services/products.

The Company is responsible for personal data in its possession or custody, including information that has been transferred to a third party for processing.

The Company hereby confirms that it is in compliance with the GDPR, proper data protection regulation of the Comoros (the "Applicable Legislation").

We only transfer the personal data to other parties if it is necessary, as described below. GDPR means the General Data Protection Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 April 2016 On the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC, as amended, replaced, or superseded and in force from time to time, and as transposed into member-state legislation.

Personal information/personal data means any information which relates to an identified or identifiable natural person. An identifiable person is one who can be identified directly or indirectly in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. It does not include data where the identity has been removed (anonymous data).

## Information we collect

While receiving or using any of our products/services, visiting our website, the following data about the client, visitor, representative, owner could be collected and processed for purposes set forth below:

Category	Personal Data Types
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<p>Identity Data</p>	<p>first name, maiden name, last name, username or other identifier, date of birth, gender, residential address, postal address, citizenship, e-mail address, contact phone number, trading account, demo account details (if they are allowed), crypto-assets addresses, wallet addresses.</p> <p>Identity documents (national identity cards, passport, driving license or other forms of identification documents), proof of address documentation, occupation, employment industry.</p> <p>Confirmation that a person is a director, board member, employee, representative, or an owner or an ultimate beneficial owner etc. of a company being our client, information on the ownership and control structure of a client – legal entity.</p>
<p>Biometrics</p>	<p>Photo, video, audio of personal data subject, other biometric identifiers and/or biometric information of personal data subject.</p>
<p>Social identity data and Preference Data</p>	<p>Data on referrals to a person, close connections, preferences, interests, favourites, risk assessment, work address, and groups.</p> <p>A person’s marketing and communication preferences, communication between us and a person, survey responses, voice record of communication between a person and us and connections with others whose personal data we may collect or store.</p>
<p>Verification and other AML/CTF Data</p>	<p>Personal data which we collect for the purpose of conducting client due diligence under applicable AML/CTF laws, photo, direct video transmission recording.</p> <p>Financial information as source of funds and source of wealth</p> <p>We are required to ask for some information to comply with Anti-Money Laundering (“AML”), Counter-Terrorism Financing (“CTF”) requirements, and to ensure we safeguard against and report any suspicious activity</p>
<p>Background Data</p>	<p>We may also collect your personal information from third parties, including, for example, business partners, analytics providers, search information providers, credit reference agencies, and third-party marketing companies or through publicly available sources.</p>

<p>Transactions, operations data</p>	<p>Personal data regarding a client’s trading operations, non-trading operations, transactions activity logs, billing, settlement details obtained by us when a client uses our services/products, balances, bonuses; trading and non-trading orders, instructions, transfers detail, history; other details of any operations, transactions a client enter into using our services/products.</p>
<p>Technical Data</p>	<p>Domain and host from which a person accesses the Internet, operator and carrier data, computers or other usable devices IP address, device type, category and model, web browser type and the operating system software, unique IDs of a person’s devices, time zone setting, location data, language data, operating system and platform, diagnostics data such as crash logs and any other data we collect for the purposes of measuring technical diagnostics, and other data.</p>
<p>Profile Data</p>	<p>A client’s username and password, login data, identification number as our client, requests by a client for services/products, communication between us and a client, representative, owner.</p>

This data is not exhaustive and is intended to provide a person with an idea of how to use fundamentally obtained data. We shall keep a record of the data collected and the purposes for which it is processed.

Furthermore, we consider certain categories of personal data to be sensitive, and such sensitive data requires additional safeguards. We will only collect, use, store, and transfer sensitive data if we can meet both, the legal basis requirement and at least one of the required extra conditions.

The additional conditions are as follows:

1. circumstances specified by regulatory rules: personal data is processed in such circumstances prescribed by the Applicable Legislation;
2. consent: a person has given direct consent to the processing of sensitive data;
3. information made public by a person: the sensitive data has become public as a result of the person’s actions;

- 4. legal proceedings: the processing is necessary for the purpose of, or in connection with, any legal proceedings, for obtaining legal advice, or is otherwise necessary for establishing, exercising, or defending legal rights;
- 5. public functions: the processing is necessary for the exercise of any functions conferred on any person by or under an enactment.

Personal data is archived and secured following the Applicable Legislation and its processing of the jurisdiction where the Company’s principal place of business is located.

### Purposes of using your personal data

We may use personal data, for the following purposes (which are considered to be informed to a person before or when a person (or client – legal entity where a person is a representative, or beneficial owner) starts using our services/products, website:

Purpose	Details
Contractual Purpose	to register a person at our website, deliver our services/products properly (which may include disclosure to relevant third parties as defined by us); to process and deliver services/products and any website features, to a person, including to execute, manage and process any trading and non-trading instructions or orders a person makes; to manage, process, collect and transfer payments, trades, transfers, fees and charges, and to collect and recover payments owed to us;
Analytical Purpose	to collect general and particular statistics of the website use, activities of clients, for sending communications, notices, updates, surveys; for client service support and ancillary purposes; to collect statistics regarding use of our website concerning visits and activities of clients, potential clients on our website, including analytics services such as Google Analytics, etc. (this analysis helps us run our website more efficiently and improve and personalize client’s online experience), to keep our records updated and to study how clients use our services/products;

<p>Marketing and Advertising Purpose</p>	<p>to send a welcome email following registration procedure; to send occasionally our services/products updates; to contact a person for surveys purposes; for other marketing purposes; to advertise our services/products and understand the effectiveness of the advertising we serve. We could use a person’s personal data and decide which services/products and offers may be relevant for such person. A person will receive marketing communications from us if he/she has requested information from us and consented to receive marketing communications, or if he/she has purchased from us and a person has not opted out of receiving such communications.</p>
<p>Compliance Purpose</p>	<p>to maintain accuracy of our records; to verify personal data for the purpose of managing our client relationships and observing the Know Your Client (“KYC”) rules; to comply with legal and regulatory obligations with respect to AML/CTF, prevention of criminal activity and lawfully protect our legal interests, make relevant risk assessments and management; to use the services of financial institutions, crime and fraud prevention companies, risk measuring companies; background checks, detect, investigate, report and prevent financial crime in broad sense, obey laws and regulations which apply to us and resolving them;</p>
<p>Communication Purpose</p>	<p>to contact a client for administrative purposes such as client support service, address technical or legal issues related to the services/products provided, or share updates and notifications about the services/products.</p>

Note that we may process personal data for more than one lawful ground depending on the specific purpose for which we are using personal data.

We will only use personal data for the purposes for which it was collected, unless we reasonably believe that we need to use it for another reason, which is compatible with the original purpose.

## Cookies

The Company's website contains cookies that ensure wider usage possibilities for the website. Cookies can be rejected using the technological features of a person's browser; however, this is not advisable, as doing so will interfere with such person's use of the Company's website. You can find more information in our [Cookies Policy](#).

## **Use of Information, Legal Basis**

At our Company, we only use personal information for the reasons set forth above. The following legal basis for personal data protection the Company uses:

1. Processing is necessary for the entry into or performance of an agreement between the client and us, for performance of the agreement to which our client is a party. We are processing personal data for contractual and communication purposes, for entering into or for performing an agreement entered into between us and a client;
2. Processing is necessary for compliance with a legal obligation to which we are subject, for compliance with a legal obligation to which we are subject, including, but not limited to, AML and CFT requirements;
3. Processing is necessary for the purposes of the legitimate interests pursued by us. We are processing personal data for purposes set forth above under legitimate interest. As part of this, we must maintain and develop our website, technical systems and IT-infrastructure, technical and organizational solutions that may also use personal data, in order to provide a person with adequate services/products. We also process personal data for protection of a client or another person vital interests;
4. A consent to the processing of personal data. We are processing personal data for marketing purpose under a client's consent, meaning freely given, specific, informed and unambiguous indication of a person wishes by which such person, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to a client;
5. Another basis prescribed by the law.

## **Security measures**

Data security is extremely important to us, and we organize and implement all necessary and relevant procedures and technology to safeguard and secure the personal data collected by us. Security measures are implemented to protect personal data from involuntary or unauthorized processing, disclosure, or destruction.

Personal data is protected by us by security safeguards appropriate to the sensitivity of the information.

Our security safeguards protect personal data against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The Company protects personal data regardless of the format in which it is held.

Depending on the nature of the risks presented by the proposed processing of personal data, we will have in place the following appropriate security measures:

1. Organizational measures (including but not limited to personnel training, policy development, security clearances and limiting access on a “need-to-know” basis);
2. Technical security measures (including but not limited to physical protection of data, physical measures, encryption, passwords); and
3. Securing ongoing availability, integrity, and accessibility (including but not limited to ensuring appropriate back-ups of personal data are held).

We ensure that the above measures provide a level of security appropriate to the special risks that exist in the processing of the personal data and the nature of the personal data being processed.

Unless we are required or permitted by law to do so, and subject to our relevant third-party business relationships (our partners, service providers, contractors, agents, financial institutions, social media etc.), we will not disclose personal data to any irrelevant third parties for security purposes.

We also restrict access to personal data to just those personnel, contractors, advisors, and auditors who need it to perform their job or service tasks. Personal data is only accessible to our personnel and contractors that require it for their work. We conduct periodic evaluations to verify that appropriate information processing rules and procedures are understood and followed. All of our physical, electronic, and procedural precautions are intended to follow Applicable Legislation.

To utilize all of the features and functions of our website, a person may be asked to submit certain personal data. A person is responsible for keeping his/her password(s) confidential and secure.

While we strive to protect personal data, a person must keep in mind that the transfer of any information over the Internet is not completely secure and is done at his/her own risk and discretion. We cannot, therefore, guarantee the security of such person's personal Data transmission to our website when it is outside our reasonable control.

While there is an inherent risk in sharing data over the Internet, we have implemented suitable security measures to protect personal data from being mistakenly lost, used, damaged, or accessed in an unauthorized or unlawful manner, altered, or disclosed.

## **Disclosure of Personal Data**

The Company has executed all the reasonable and necessary measures to maintain a high level of security for a client's/ visitor's/representative's/owner's data. Our employees, directors, officers, and/or representatives are obliged to respect a person's privacy and personal data may only be disclosed to third parties when appropriate legal grounds exist.

We want to inform that we might share personal information, with approved third parties who are authorized by us due to established contractual relations.

We may transfer client's, visitor's personal data to the following third parties:

1. Regulatory authorities to whom we are obligated to disclose personal data under the law, AML and CFT requirements; agencies that deal with law enforcement; entities in cases of fraud or collusion prevention, identity verification, payment processing, credit reference; banks/financial institutions; courts;
2. Our related entities, personnel, officers, agents, contractors, designated representatives, other companies that provide services to us, other third parties to satisfy the purposes for which the information was collected or for another purpose, if that other purpose is closely related to the primary purpose of collection and a natural person would reasonably expect us to disclose the information for that secondary purpose;
3. Third parties who help us to analyze the information we collect so that we can administer, support, improve or develop our business and services/products we provide;

4. Identification and verification service providers engaged by us for a person verification, performance of AML and CFT requirements, as well as other software service providers who assist us to provide services/products;
5. Our professional advisers such as consultants, bankers, professional indemnity insurers, brokers and auditors so that we can meet our regulatory obligations, and administer, support, improve or develop our business;
6. Server hosts, which store our data, communication service providers, which help us stay in touch with a client, visitor;
7. Third parties, including those in the fintech, brokerage industry, marketing and advertising sectors, to use personal data in order to let a person know about services which may be of interest to such person in accordance with the Applicable Legislation;
8. Banking, financial, blockchain service providers;
9. Debt recovery agencies who assist us with the recovery of debts owed to us;
10. To facilitate the sale of all or a substantial part of our assets or business or to companies with which we propose to merge or who propose to acquire us and their advisers; and
11. Other third parties which services, facilities we use, in order to provide our services/products and deal with certain processes necessary for the operation of the website, perform internal procedures and law requirements.

We have taken steps to guarantee that third parties which process personal data have appropriate technological and organizational safeguards in place to secure this personal data, and we will also ensure that they are compliant with the Applicable Legislation. We have taken precautions to guarantee that third parties contracted by us preserve the confidentiality and security of personal data, and that personal data is handled exclusively for the purposes set forth in this Privacy Policy.

Personal data shall not be processed (or cause to be processed) in a country that has not been designated by the European Commission as providing an adequate level of data protection unless it has put in place such measures as are necessary to ensure such transfer is in compliance with personal data protection laws, except where otherwise required by applicable law.

## Personal Data Subjects' Rights

**Right to Access** – right to ask us to provide a copy of personal data which we process, access to a person's personal data, which enables him/her to obtain confirmation of whether we are processing his/her personal data. A person has the right to request the following additional information concerning his/her personal data:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipient(s) or category(ies) of recipient to whom/which personal data have been or will be disclosed;
4. the source from which the personal data is being collected;
5. the recipients of classes of recipients to whom they are or may be disclosed;
6. the criteria determining the period for which personal data will be stored etc.

**Right to Rectification** – a person has the right to ask us to rectify personal data in case the data is incorrect, misleading, excessive or incomplete, or not relevant to the purpose for which the personal data is held. The Company takes care that the personal data that is used on an ongoing basis, including information that is disclosed to third parties, generally be accurate and up-to-date.

**Right to Erasure** (sometimes called Right-to-be-forgotten) – a person has the right to ask us to erase personal data, unless we are is obliged to continue processing such person's personal data under law or under an agreement between a person and us, or in case we have other lawful grounds for the continued processing of personal data.

A person may amend or remove any portion of his/her personal data at any time by contacting us.

A person's personal data will not be erased immediately; it will be stored at our facility to comply with statutory obligations. As required by the AML and CFT requirements, we must store any collected information within a fixed term from relationship termination. Biometrics is processed and stored so long as the other personal data as set forth in this Privacy Policy.

**Right to Restriction** – a person has the right to ask us to restrict the processing of the personal data in case the data is incorrect or incomplete or in case personal data is processed unlawfully.

Upon amendment or removal of personal data, it is archived and safekept separately from processed personal data. Such restricted personal data is processed purely for storing purposes and cannot be accessed automatically or by unauthorized personnel. Restricted data may only be used or restored only in select ways prescribed by law or legal proceeding.

A person's personal data is stored for as long as their storage is required for appropriate purposes for the processing of personal data, as well as in accordance with the applicable laws (including but not limited to AML/CFT laws).

**Information Availability** – a person has the right to receive personal data concerning such person provided to us, in a structured, commonly used and machine-readable format. We are obliged and have provided all the information which a person has right to receive.

**Right to Data Portability** – a person has the right to ask us to provide such person or, in case it is technically feasible, a third party, his/her personal data, which he/she has provided to us and which is processed in accordance with his/her consent or an agreement. Note that this right only applies to the automated information which a person initially provided consent for, us to use or where we used the information to perform an agreement with such person.

**Right to Object** – a person has the right to object to processing his/her personal data in case there is a reason to believe that we have no lawful grounds for processing the personal data and there is something about such person's particular situation which makes such person want to object to processing on this ground as he/she feels it impacts on his/her fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process personal data which override a person's rights and freedoms.

**Right to Withdraw Consent for Data Processing** – a person has the right to withdraw the consent granted for the processing of personal data at any time. Withdrawal does not affect the lawfulness of the processing conducted before the withdrawal.

**Right to File a Complaint** – a person has the right to file complaints regarding his/her personal data. In addition, he/she has a right to lodge a complaint with the respective supervisory body.

If a person has any queries in relation to this Privacy Policy, he/she wish to access or correct the personal data we hold, or make a complaint, please contact us at email: [support@wingomarkets.com](mailto:support@wingomarkets.com) (our Data Protection Officer being authorized officer).

If a person is not satisfied with our handling of a complaint or the outcome of a complaint, he/she has the right to lodge a complaint with an appropriate authority.

## **Privacy Policy Updates**

We reserve the right to change, vary, and revise this Privacy Policy whenever lawfully required or in light of our internal requirements. Unless clearly specified differently, such revised or updated versions will take effect as of the publishing date. By using our website, services/products, a person agrees to and accepts the terms and conditions of this Privacy Policy, including its updates.