

Privacy Policy

One World Markets LTD





1. Introduction

- 1.1. In accordance with Article 24 GDPR (EU) 2016/679, taking into account the nature, scope, context and purposes of processing, as well as the risks to the rights and freedoms of natural persons, One World Markets Ltd has implemented appropriate technical and organisational measures to ensure compliance with the General Data Protection Regulation (GDPR) as amended from time to time. This Policy provides to data subjects, information on who we are, how and why we collect personal data, the types of data collected, how data is used, when and with whom it may be shared and how data is stored safely. It also provides information on data subjects' rights in relation to their personal data being processed by us and on how to contact us and the supervisory authority in the event of a complaint. This policy has been drafted in compliance with the requirements of the GDPR.
- 1.2. This Privacy Policy is applicable to One World Markets (Seychelles) Ltd's website, WWW.OWMARKETS.COM. In this Privacy Policy we explain how we collect and use your personal information that we obtain when you use the Company's services, visit or use our website or otherwise interact with us, how we share your information and the steps we take to protect your information. We may make changes to this Policy from time to time and it is important that you check this Policy for any updates. Any personal information we hold will be governed by the current Policy at the given time. If we make changes, we consider to be important, we will communicate them to you. Any reference to 'us', 'our', 'we' in this Policy is a reference to the Company as the context requires unless otherwise stated. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this Policy is a reference to any of our client and potential clients as the context requires unless otherwise stated. By accessing our website, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this Policy and how we process any information you disclose to us including personal data prior to becoming a client. Once you open an account with us you agree that this Policy, including any amendments, will govern how we collect, store, use, and share and in any other form process your personal data and your rights during our business relationship and after its termination. This Policy is incorporated into, and subject to, the Client Service Agreement and Website Terms of Use.

2. Collection of Information

- 2.1. In the process and following your registration as a client for a demo or live account with us and/or filling any other form on our Website, subscribing to our services, news or offers, marketing communications or posting material or contacting us via our communication methods, the following information about you ("Your Data") will be collected and stored for business, educational, service related, and/or legal purposes. We will limit the collection of personal information to what is necessary to administer our business and carry out our regulated activities in an effort to provide you with superior service.
- 2.2. Information that you provide to us directly:
 - (a) Personal information such as, Name, Surname and contact details, Date of Birth and gender, Information about your income and wealth including details about your assets, liabilities, account balances, trading statements, tax and financial statements, Profession and employment details, Location data, Knowledge and experience in trading, risk tolerance and risk profile, IP Address, Bank Account, e-wallets and credit



card details, Details of your visits to our website or our Apps, including but not limited to traffic data, location, weblogs and other communication data.

- **2.3.** We are also requirement by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents
 - (a) Identification Documents such as, Passport, Driver's license, National Identity Card, Utility Bills, Trust Deed, Source of Wealth declaration, Bank statements.
- If you are a corporate client, we are required to collect additional information such as corporate documents of incorporation, address, shareholders, directors, officers including additional personal information on the Shareholders and Directors. We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.
 - **2.4.** However, the meaning of data is not limited to the above. It is also personal data resulting from observation of your activities (e.g. where using a device or service). This may include:
 - (a) History of website usage or search activities, details of your visits to our Website including, communication data;
 - (b) Traffic and location data or website traffic pattern information, including IP addresses, operating system and browser type, for system administration and to report aggregate information to our advertisers. This information is only used in masked or aggregated form, which means that the individual user is not identifiable.
 - (c) Communications between you and One World Markets via Live Chat, email, or telephone call.
 - 2.5. Your e-mail address may be used by One World Markets in relation to its products and services (including any marketing campaigns related to these products or services). If you do not wish to receive such marketing material and marketing communications, you can opt-out at any time by clicking on 'unsubscribe' or by sending an email to support@owmarkets.com.

3. Using of Personal information

3.1. We collect, use, disclose, transfer and store Your Personal Data when required to provide our services and for our operational and business purposes as described in this Policy. Your Information (not in the public domain or already possessed by us without a duty of confidentiality) which we hold is to be treated by us as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of our Services to you or furthering of the Client Service Agreement between us, establishing and managing your account or a relationship between us, reviewing your ongoing needs, enhancing customer service and products, giving ongoing information or opportunities that we believe may be relevant to you, improving our relationship, anti money laundering and due diligence checks, for research and statistical purposes and for marketing purposes (according to the Agreement between us), as applicable. We may also collect and process non-personal, anonymised data for statistical purposes and analysis and to help us provide better services. We do not sell or disclose your personal information to third parties. We may share information with third parties with the purpose of providing the service you have requested or to enable your participation in the services provided by third parties. Third party disclosures may include sharing information that perform your



transactions with Us, including those that provide professional, legal, or accounting advice to Us. Third party companies that help Usin service provision are required to maintain the confidentiality of user information and use your personal information only for the purposes that we demand.

4. Call Recording

4.1. All telephone calls inbound and outbound are recorded. The recordings are stored on secure systems and accessed if required for: business purposes, monitoring of employees, to investigate or resolve complaints or for any legal obligation that One World Markets is required to adhere to. We engage service providers who abide to applicable data protection legislation for the operation of our telephone systems. We may be permitted or required to disclose a call recording (including personal data) without your explicit consent (under applicable legislation) if One World Markets has a legal obligation to do so. The legal basis for processing your personal data, retention periods and your rights in relation to your information can be found in this Policy.

5. Disclosure of Personal Information

- **5.1.** We do not disclose personal information to third parties without your consent unless specified in this Policy. We also impose strict restrictions on how our processors can use and disclose the data we provide. We disclose only what is necessary to third parties to perform their contractual obligations with us. Here are the types of third parties we share information with:
 - (a) where requested by our Supervisor (the Financial Service Authority of Seychelles) or any other regulatory, public and government authority having control or jurisdiction over us or you or our associates or in whose territory we have Clients or Providers, as applicable;
 - (b) To carry out anti-money laundering, sanctions or Know Your Customer checks as required by applicable laws and regulations;
 - (c) In order to comply with our obligations deriving from the applicable law and regulations, which may include laws and regulations outside your country of residence;
 - (d) Where required by law or a court order by a competent Court;
 - (e) To relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
 - (f) A Broker so as to execute your Instructions or Orders and for purposes ancillary to the provision of our Services to you as our Client;
 - (g) To our professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
 - (h) To other service providers for statistical purposes in order to improve our marketing, in such a case, the data will be provided in an aggregate form;
 - (i) To credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks



of you. To do so they may check the details you supplied against any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes. A record of the search will be retained by us;

- (j) To other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist us collect, storage, process and use Your Information or get in touch with you or improve the provision of our Services or activities under the Agreement between us;
- (k) To our employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.
- (I) To data reporting service providers;
- (m) To market research call centers that provide telephone or email surveys with the purpose to improve our Services or activities, but only contact details;
- (n) Where necessary in order for us to defend or exercise our legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority, as the case may be;
- (o) At your request or with your consent;
- (p) To our Affiliates;
- 5.2. We ensure that any contract signed between us and our processors is binding as per applicable legislation. The contracts will be setting out the subject-matter and duration of the processing, the nature and purposes of the processing, the type of personal data and categories of data subjects and the risk to the rights and freedoms of the data subjects. Contracts will also include the specific tasks and responsibilities of the processor in the context of the processing to be carried out. After the completion of the processing, the processor(s) should, at the choice of the controller, return or delete the personal data, unless there is a requirement to store the personal data under Union or Member State law to which the processor is subject. This data sharing with our processor(s) enables us to proceed, for instance, with our regulated activities and duties (i.e. KYC) in order to meet our regulatory obligations. Some of those third party recipients (processors) may be based outside the Seychelles; if the third party recipient is located outside the Seychelles in a country not ensuring an adequate level of data protection, the transfer will only be completed if a written agreement has been entered into between One World Markets and the third party ensuring an adequate level of data protection. We may be required or permitted, under applicable legislation, to disclose personal data without your explicit consent, for example, if we have a legal obligation to do so, i.e. for court proceedings, investigation of complaints, criminal sanctions etc.

6. Cookie Data

6.1. We use cookies and similar technologies to provide and support our Services. We will use cookies to distinguish you from other users of our website. For more information about cookies and how we use them, <u>please read our Cookies Policy</u>.



7. When and how do we obtain your consent?

- We access, store and share your information with regulators, law enforcement parties/agencies or others by request:
 - (a) We may need to respond to legal, regulatory or judicial requests and/or court orders.
 - (b) We may need to detect, prevent and address fraud, unauthorised use of our services or products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or products), you or others, including part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-parties about the reliability of your account in order to prevent fraud, abuse and other harmful activity on and off our products.
- Information we receive about you (including financial transactions, deposits and withdrawals) can be processed and stored for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigation of possible violations of our terms or policies, or otherwise to prevent harm.

8. Protection Measures

- **8.1.** Your Information is stored on secure servers. We limit access of your Information only to those employees or partners that need to know the information in order to enable the carrying out of the Agreement between us.
- 8.2. All Company's employees and/or partners who have access to, or associated with the processing of your Information, are contractually obliged to respect the confidentiality of your Information and abide by the privacy standards we have established. We have procedures in place regarding how to protect and use Your Information, for example by requesting our Affiliates and employees to maintain the confidentiality of Your Information. We will not keep Your Information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under Applicable Regulations, we will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for at least seven (7) years after termination of the Agreement between us. In any event, we will keep Your Information for the duration of applicable Limitation of Actions Laws as a minimum.
- **8.3.** While we will use all reasonable efforts to protect Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.





9. Your Rights

You have a number of important rights. In summary, those include rights to:

- **9.1.** You have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. To make a request, please contact us, verifying your identity and specifying what information you require. We will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data.
- 9.2. The right to access personal data
- **9.3.** Right to data portability: to receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party (another controller) in certain situations.
- 9.4. The right to withdraw consent to processing at any time, where relevant
- **9.5.** The right to object at any time to processing of personal information concerning you for direct marketing purposes
- **9.6.** The right to object in certain circumstances our continued processing of your personal information
- **9.7.** fair processing of information and transparency over how we use your use personal information
- 9.8. Restrict our processing of your personal information in certain circumstances.

10. Data retention Period

For audit trail purposes, One World Markets shall hold personal data for a period of at least seven years in order for us to comply with our record keeping obligations under the Anti-Money Laundering Laws. At the end of that period, we will delete all personal data relating to you, unless a legal requirement requires us to keep the data for a prolonged period of time, or the Data Subject has expressly consented to their data being held for an extended period of time.

11. How to complain or resolve your queries

If you have any questions or queries regarding this policy, wish to access or change your information or would like to raise a complaint, or if you have any questions about security on our Website, you may contact us through our "<u>Contact Us</u>" page. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can escalate your complaint to the data protection commissioner in your jurisdiction.