

PRIVACY POLICY

(TERMS OF PERSONAL DATA PROCESSING)

I. INTRODUCTION

At ProfiXone Capital LLC (hereinafter referred to as the “**Company**” or „**We**”) we’re committed to protecting and respecting your privacy. This Privacy Policy (hereinafter referred to as the the “**Privacy Policy**”) governs your access to and use of this Website, www.profixone.com (hereinafter referred to as the “**Website**”), and associated content.

Therefore, the Company wants to assure you the highest standards of confidentiality and transparency regarding the personal data that are processed when you access our Website or use our Services.

Through this Privacy Policy, the Company offers you the insurance, in carrying out the operations of processing the personal data, the Company comply with the applicable legislation on the protection of personal data, including, but not limited to the provisions of Regulation (EU) 679/27-Apr-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 (hereinafter referred to as the General Data Protection Regulation or “**GDPR**”), the decisions of the National Supervisory Authority for the Processing of Personal Data, as well as to the legislation implementing the ANSPDCP decisions (hereinafter referred to as the “**PDP Laws**”).

Since the Company processes a series of personal data the moment you access and use our Website, we want to provide assurances that the processing will take place in compliance with the principles of transparency and security of personal data. **This privacy policy is intended to help you understand which personal data we collect, the purpose for which the data are collected and what will happen to your data after they have been collected.**

This Privacy Policy applies to all the Users and Clients of our website.

Within the meaning of the present Privacy Policy, the “**User**” is any natural or legal person whom accesses the content of our Website and the “**Client**” is any natural or legal person who contracts the services offered by the Company on the Website.

We invite you to carefully read the entire content of the Privacy Policy before you start using our Website or our Services.

II. CATEGORIES OF PERSONAL DATA PROCESSED

The Company receives and stores information containing personal data when you:

- access or use the content of the Website;
- open an account associated with the services requested;
- use the search engine of the website;
- communicate with us by the contact form, phone, e-mail or otherwise.

As a result of the actions identified above, the Company collects from you the following categories of personal data: Name, Surname, E-mail address, Telephone Number, Address of residence, Date and Place of birth, Economic profile, Information about your personal knowledge and experience in relation to financial instruments provided by the Company, the types of browser and versions you use, the date and the time of accessing the website, the internet protocol address (IP address), geographic location, the operating system used, the behavioral browsing trends, the Client financial resources and losses, information related to their trading account, trading strategy, deals, history of transactions, amounts of money traded, any other financial information, as well as any other personal data, as defined in Article 4 GDPR, which are transmitted or made known as a result of communication with the Company.

We receive and store certain types of information each time you interact with us. As stated, we use "cookies" and obtain certain types of information when the web browser accesses www.profixone.com or advertisements and other types of content served by or on behalf of the Company on the Website. We invite you to learn more accessing the Cookies Policy.

III. PRINCIPLES OF PERSONAL DATA PROCESSING

Your personal data is processed with the following principles:

(a) processed lawfully, fairly and in a transparent manner in relation to the data subject (**'lawfulness, fairness and transparency'**);

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, not be considered to be incompatible with the initial purposes (**'purpose limitation'**);

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**'data minimisation'**);

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (**'accuracy'**);

(e) 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; (**'storage limitation'**);

(f) 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, using appropriate technical or organisational measures (**'integrity and confidentiality'**).

IV. PURPOSES OF THE PROCESSING

The Company processes personal data for one or more of the following purposes:

- in order to fulfill a contract in order to provide the requested services or take steps linked to a contract such as processing your registration on our Website or sending you information about changes to our terms or policies;
- where it is necessary for purposes which are in the Company or third parties legitimate interests such as (a) to provide the information or content you have requested; (b) to contact you about our programs, products, features or services; (c) for internal business purposes such as identification and authentication or client service and portfolio tracking; (d) in a statistical form, in order to indicate the profile of website's Users, market research, tracking and monitoring of transactions and Client/User's behavior (d) to ensure the security of our Website, by trying to prevent unauthorized or malicious activities, to ensure the protection and security of our systems, detecting and preventing fraud, solving different disputes; (e) to enforce compliance with our terms and policies; (f) to help other organizations (such as copyright owners) to enforce their rights; (g) to provide the correct content of the site; (h) to optimize the content of the site;
- in order to comply with legal obligations incumbent under applicable legislation;
- in order to provide to the competent authorities the information necessary for an investigation in the event of a cyber attack or otherwise;

There are cases when the personal data is processed also for secondary purposes (eg. for archiving, for internal or external audit etc.), which are always compatible with the main purposes for which the data were collected. In cases where the personal data may be used for other purposes than those mentioned above, your consent will be required in advance, unless there is a legal obligation or there is another legal basis for the processing of data.

V. THE STORAGE PERIOD OF PERSONAL DATA

The Company will store your personal data for a period proportionate to that of the performance of his contractual relations and implementation and fulfillment of the purposes described in **Article IV** and subsequently, to the extent that there is a legal obligation or legitimate interest in this respect (by way of example, we indicate the need to comply with legal accounting/tax or financial obligations or the need to keep documents in order to settle legal disputes).

In cases where there is a legal obligation or a legitimate interest in keeping the documents/acts containing your personal data, the Company will ensure the confidentiality of the data to which has access or become aware for as long as is necessary for the exercise of the legitimate interest or the obligation imposed by law.

VI. DISCLOSURE OF PERSONAL DATA

We work closely with other partners. There are cases when third parties companies operate through our website providing ads for advertising and marketing purposes, which is why we may need to disclose the personal data you provide to us. In other words, the Company contracts services with other companies or individuals to perform functions on our behalf. Examples include email and data analysis, marketing support, search results and links .They may have access to the personal data provided to us only for the purpose of carrying out their duties.

The Company may also provide the personal data and relevant documents containing such data to other third parties with whom it is in a contractual relationship, to their agents and to other authorized persons, but only under a confidentiality agreement through which the third parties guarantee that these data are kept secure and only for the purposes specified in the present Privacy Policy.

The Company also reserves the right to disclose your personal data, when this is required in order to comply with the enforcement legislation and / or at the request of the competent authorities; in order to implement the Privacy Policy; to protect the property rights against any claims of third parties, to protect the security or integrity of services and any equipment used, respectively to ensure the safety of the Company or other persons against fraudulent, abusive or illegal uses.

Except for the situations identified above, you will be notified whenever your personal data may be disclosed to third parties and you will have the right to refuse such a disclosure.

In addition, the Company limits access to your personal data to those employees and other third parties who require access to limited data of Clients. They will process your personal data on our instructions and they are subject to a duty of confidentiality.

VII. YOUR RIGHTS IN ACCORDANCE WITH GDPR

In accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals regarding the processing of personal data and the free movement of such data and repealing Directive 95/46 / CE, you have the following rights:

- a. The right to information** - the right to be informed about the identity of the controller - the Company, the purpose for which the data is processed, the recipients to whom your data are disclosed, the rights recognized by the GDPR and the conditions under which these rights can be exercised;
- b. The right of access** - the right to obtain from us, upon request and free of charge, unless these requests are repetitive or made with clearly bad faith, a confirmation that your personal data are or are not processed and the right to access these data;
- c. The right to rectification** - you can request the rectification of your inaccurate personal data;
- d. The right to delete data ("the right to be forgotten")** - deletion of your personal data can occur when the processing has not been legal or in other cases provided by law (for example, when the data are no longer required for the fulfillment of the purpose for which they were processed). However, we cannot delete your personal data when the processing is required by the law;
- e. The right to restrict the processing** - you can request to restrict the processing of your personal data if you dispute the accuracy of the processed data, as well as in other cases provided by the law;
- f. The right to opposition** – you have the right to oppose at any time, for well-founded and legitimate reasons, to your personal data being processed, except in cases where there are contrary legal provisions or when the processing is based on our legitimate interest;
- g. The right to data portability** - you can receive your personal data in a format that can be read automatically, or you can request the transmission of the data to other third parties;
- h. The right to file a complaint** - you can file a complaint regarding the processing of your personal data to the National Supervisory Authority for the Processing of Personal Data or to the competent courts;
- i. The right to withdraw your consent** – in cases we process your personal data based on your consent, we inform you that this consent can be withdrawn at any time. The withdrawal of your consent will only take effect for the future. However, if the processing of

your personal data is mandatory in order to provide our services and this can be carried out on the basis of other legal provisions, the Company will continue to process your data;

j. The right not to be subjected to an automatic decisions or additional profiling related to an automatic decisions – you have the right to request and obtain the withdrawal, cancellation or reassessment of any decision having legal effects, adopted exclusively on the basis of personal data processing performed by automatic means, designed to evaluate some aspects of your personality, such as professional competence, credibility, behavior or other such aspects;

In respect of you're rights, the Company informs you that you are able to exercise the above-mentioned rights if this does not contradict the legal requirements in relation to the Prevention of Money Laundering and Terrorist Financing Laws, Record Keeping obligations of the Company.

We will provide you an answer, at any of your requests or complaints, within a reasonable period of time, in order to comply with the applicable legal provisions.

VIII. PERSONAL DATA SECURITY

We follow the highest standards to protect the personal data processed, both during the transmission to us and later.

For this purpose, we have adopted technical security politics and procedures in order to protect the personal data against loss, destruction, alteration, unauthorized changes, disclosure, access or use, and any other form of illegal processing or possession.

However, given that no transmission or storage of data is 100% secure, regardless of whether it is electronic or physical, if we find out about a breach of our security system, we will inform both you and the competent authorities about the occurrence of the breach and any relevant information related to the security incident that occurred, in accordance with the law in force, within a maximum of 72 hours.

IX. CONSENT TO WORLDWIDE TRANSFER AND PROCESSING OF PERSONAL INFORMATION

ProfiXone Capital LLC is located in the St. Vincent and the Grenadines and the terms of this Privacy Policy shall be governed by and construed in accordance with the St. Vincent and the Grenadines legislation, without regard to any principles of conflicts of law.

Regardless of your geographical location, by accessing the Website and Services and providing personal information through it, you agree and acknowledge and consent to the collection, maintenance, processing, and transfer of such information in and to the St. Vincent and the Grenadines and other countries and territories.

These other jurisdictions may have different privacy laws from your home jurisdiction and provide different levels of protection of personal information, but in all cases ProfiXone Capital LLC does have processes and procedures in place to provide adequate levels of protection to protect the transfer of your personal data.

In case of international transfers originating from the European Economic Area (EEA), where the European Commission has recognised a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on the following basis: For transfers to non-EEA countries whose level of protection has not been recognised by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with you, such as, when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules

You agree that the terms of this Privacy Policy will apply and you consent to the transmission and processing of your personal information in any jurisdiction.

X. THIRD-PARTY WEBSITES

Our Website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the Privacy Policy notice of every website you visit.

XI. CHILDREN

The ProfiXone's services are not intended for children under the age of 18, and we do not knowingly collect information from children under the age of 18.

Children aged 18 or younger should not submit any personal information without the permission of their parents or guardians. By accessing and browsing our Website, you are representing that you are at least 18 years old, or that you are 18 years old or younger and have your parents' or guardians' permission to use our Website or our Services.

XII. CHANGES

Our Privacy Policy may change from time to time, but we assure that your rights will not be affected under these changes without your explicit consent.

We will publish any changes to the privacy policy in visible places to make it easy to identify updates and to be aware of its contents.

To exercise all relevant rights, queries or complaints to any data protection matter between you and the Company, please in the first instance contact our Data Protection Officer at: support@profixone.com.

Effective Date: August 1st, 2021.