



PVP MARKETS

Pro Venture Prime

PRIVACY POLICY

PVP MARKETS LTD

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1 Introduction

- 1.1 PVP Markets Ltd (hereinafter the “**Company**”) is incorporated under the laws of Saint Vincent and the Grenadines with Registration 24994 having its registered office at First Floor, First St Vincent Bank LTD Building, James Street, Kingstown, Saint Vincent and the Grenadines. The Company is authorised as an International Business Company under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009 (herein the “Law”).
- 1.2 The objects of the Company are all subject matters not forbidden by International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and the Grenadines, 2009, in particular but not exclusively all commercial, financial, lending, borrowing, trading, service activities and the participation in other enterprises as well as to provide brokerage, training and managed account services in currencies, commodities, indexes, CFDs and leveraged financial instruments.

2 Scope of the Policy

- 2.1 The Company is committed to protecting and respecting Client’s personal data. This Policy describes what types of personal data the Company collects about the Client when the Client chooses to use Company’s services, how the Company will use Client’s personal data, when and with whom the Company shares it and how the Company will keep it safe. It also details Client’s rights in respect of Company’s processing of Client’s personal information and how the Client may exercise them.

- 2.2 The Company may make changes to this Policy from time to time and it is important that the Client checks this Policy for any updates. Any personal information The Company holds will be governed by Company's most current Privacy Policy. If the Company makes changes the Company considers to be important, the Company will communicate them to the Clients.
- 2.3 This Policy is addressed to Clients and potential Clients. If the Client is the Company's employee, a contractor to the Company or a third-party service provider, Client's personal information will be used in connection with Client's employment contract, Client's contractual relationship or in accordance with Company's separate policies which are available by contacting the Company.
- 2.4 By accessing Company's websites including using any of the communication channels to contact it, the Company considers that the Client has read and understood the terms of this Policy and how the Company processes any information the Client discloses to it including personal data prior to becoming a Client. Once the Client opens an account with the Company, the Client agrees that this Policy, including any amendments will govern how the Company collects, stores, uses, share and in any other form processes Client's personal data and Client's rights during Company's business relationship and after its termination.

3 Collection of information

- 3.1 As part of Company's business, the Company collects personal data from Clients and potential Clients that include the following:
- A) name, surname and contact details
 - B) date of birth and gender

- C) information about Client's income and wealth including details about Client's assets and liabilities, account balances, trading statements, tax and financial statements
- D) profession and employment details
- E) location data
- F) knowledge and experience in trading, risk tolerance and risk profile
- G) IP address, device specifications and other information relating to Client's trading experience
- H) Bank account, e-wallets and credit card details
- I) details of Client's visits to Company's Website or Company's Apps including, but not limited to, traffic data, location data, weblogs and other communication data.

3.2 The Company uses cookies to store and collect information about Client's use of Company's Website. Cookies are small text files stored by the browser on Client's equipment's hard drive. They send information stored on them back to Company's web server when the Client accesses Company's Website. These cookies enable the Company to put in place personal settings and load Client's personal preferences to improve Client's experience. The Client can find out more about Company's cookies on Company's "Cookies Policy" available on Company's Website.

3.3 The Company also keeps records of Client's trading behaviour, including a record of:

- A) products the Client trades with us
- B) historical data about the trades and investments the Client has made including the amount invested
- C) Client's preference for certain types of products and services

3.4 The Company is required by law to identify the Client if the Client is opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require the Company to sight and record details of certain documents (i.e. photographic and non-photographic documents) to meet the standards, set under those laws. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services the Company provide to the Client, includes:

- passport;
- driver's licence;
- national identity card (if applicable);
- utility bills;
- trust deed (if applicable);
- a credit check on the individual; or
- other information the Company considers necessary to Company's operations and activities.

3.5 If the Client is a corporate client The Company is required to collect additional information such as corporate documents of address, shareholders, directors, officers including additional personal information on the Shareholders and Directors. The Company has the right to ask any additional information that is necessary to be compliant with Company's legal and regulatory requirements.

3.6 The Company obtains this information in a number of ways through Client's use of Company's services and websites, the account opening applications, Company's demo sign up forms, webinar sign up forms, website cookies, and similar tracking technology built into Company's Websites and Apps, subscribing to news updates and from information provided in the course of Company's on-going relationship.

- 3.7 The Company may also collect this information about the Client from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.
- 3.8 The Company may ask for other personal information from time to time (for example, through market research, surveys or special offers). If the Client chooses not to provide the information the Company needs to fulfil Client's request for a specific product or service, the Company may not be able to provide the Client with the requested product or service.
- 3.9 The Company may record any communications, electronic, by telephone, in person or otherwise, that it has with the Client in relation to the services the Company provide to the Client and its relationship with the Client. These recordings will be Company's sole property and will constitute evidence of the communications between them. Such telephone conversations may be recorded without the use of a warning tone or any other further Policy.

4 Disclose of personal information

- 4.1 In the course of the performance of the Company's contractual and statutory obligations, the Client's Personal Data may be disclosed to third parties. Most of such third parties enter into contractual arrangements with the Company by which they observe data protection and confidentiality. Under the circumstances referred to above, recipients of Personal Data may be, for example:
- third party payment service providers who help the Company provide its Clients the services of securely deposit and withdrawal to and from a Client's account;

- other service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support;
- governmental and regulatory bodies, including law enforcement authorities, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Company to comply with its legal and regulatory requirements;
- credit reference and fraud prevention agencies, third party authentication service providers and other financial institutions for the purposes of credit checking, fraud prevention and anti-money laundering controls;
- third party service providers for the provision of the required customer support services through live chat and the Company's website visits and traffic monitoring through cookies;
- external consultants including legal and tax consultants; and
- affiliates of the Company;

4.2 In accordance with the recommendations of Payment Card Industry Security Standards Council, Client's card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit. The Company does not collect, store or process any personal credit or debit card information. All payment transactions are processed through payment services providers

5 Obtaining Client's consent

- 5.1 The Company may process Client's personal data for one or more lawful bases of processing ("Lawful Basis") depending on the specific purpose for which The Company is using Client's data.

The Lawful bases are the following:

- to perform Company's contractual obligations towards the Client
- to be compliant with the legal and regulatory requirements
- to pursue Company's legitimate interests

Where Company's use of Client's personal information does not fall under one of these three Lawful bases the Company requires Client's consent. Such consent shall be freely given by the Client and the Client has the right to withdraw his consent at any time by contacting the Company using the contact details set out in this Privacy Policy or by unsubscribing from the email lists.

6 Management of personal information

- 6.1 The Company is committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.
- 6.2 The Company has appointed a Data Protection Officer to ensure that Company's management of personal information is in accordance with this Privacy Policy and the applicable legislation.
- 6.3 The Company requires organizations outside the Company who handle or obtain personal information to acknowledge the confidentiality of this information,

undertake to respect any individual's right to privacy and comply with all relevant data protection laws and this Privacy Policy.

With respects to data protection measures, the Company has in place are the following:

- The Company trains Company's employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals.
- The Company requires its employees to use passwords and two-factor authentication when accessing Company's systems.
- The Company applies Chinese walls and employees only have access to the personal data required for the purposes of the tasks they handle.
- The Company applies data encrypting technologies during data transmission during internet transactions and client access codes transmitted across networks.
- The Company employs firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses entering Company's systems.
- The Company employs physical and electronic means such as access cards, cameras and guards to protect against unauthorized access.

7 Storage of personal data

7.1 The Company holds personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information and holds from misuse, loss, unauthorised access, modification or disclosure.

When the Company considers that personal information is no longer needed, the Company will remove any details that will identify the Client, or it will securely destroy the records.

However, the Company may need to maintain records for a significant period of time. The Company is subject to investment services and anti-money laundering laws which require it to retain copies and evidence of the actions taken by the Company in regard to Client's identity verification, sources of incomes and wealth, monitoring of Client's transactions, telephone, chat and email communications, orders and trades history, handling of Client's complaints and records that can demonstrate that it has acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five (5) years after Company's business relationship with the Client has ended or even longer if the Company is asked by Company's Regulators.

8 Client's rights

- 8.1 Personal Data Rights Clients have the following rights in relation to their Personal Data:
- A) **Right of access:** The Client has the right to be informed whether the Company is processing his/her Personal Data, and if so, to provide the Client with a copy of that Personal Data.
 - B) **Right to rectification:** The Client is entitled to request that the Company corrects or completes his/her Personal Data if it is inaccurate or incomplete.
 - C) **Right to erasure:** This enables the Client to ask the Company to erase or remove the Client's Personal Data under certain circumstances, such as when the Client withdraws his consent.

- D) **Right to restrict processing:** This enables the Client to ask the Company to restrict the processing of the Client's Personal Data if:
- it is not accurate;
 - it has been used unlawfully but the Client doesn't want it to be deleted;
 - it is not relevant any more, but the Client wants the Company to keep it for use in possible legal claims;
 - the Client has already asked the Company to stop using his Personal Data, but he is waiting for the Company to confirm if it has legitimate grounds to use such Personal Data.
- E) **Right to data portability:** The Client has the right to obtain his/her Personal Data provided to the Company in a structured, commonly used and machine-readable format.
- F) **Right to object:** The Client may ask the Company at any time to stop processing his/her Personal Data, and the Company will do so:
- If the Company is relying on a legitimate interest to process the Client's Personal Data and the Company cannot demonstrate compelling legitimate grounds for the processing,
 - If the Company is processing Client's Personal Data for direct marketing.
- G) **Rights in relation to automated decision-making and profiling:** The Client has the right to be free from decisions based solely on automated processing of his/her Personal Data, including profiling, that affect him/her, unless such profiling is necessary for entering into, or the performance of, a contract between Client and the Company or the Client provides explicit consent.
- H) **Right to withdraw consent:** If the Company relies on the Client's consent to process his/her Personal Data, the Client has the right to withdraw that consent

at any time. This will not affect the lawfulness of the processing that took place on the basis of the Client's prior consent.

- l) **Right to lodge a complaint with the data protection authority:** If the Client has a concern about the Company's privacy practices, including the way in which the Company handled his/her Personal Data, the Client can report it to the relevant data protection authority.

9 Client's query and complaint

- 9.1 If the Client wants to exercise Client's rights, he should email at privacy@pvpmarkets.com using the registered email address the Client disclosed to the Company.
- 9.2 The Company tries to respond to all requests within 1 (one) month. Occasionally, it may take longer than 1 (one) month if Client's request is particularly complex or the Client has made a number of requests. In this case, The Company will notify the Client within 1 (one) month of the receipt of Client's request and keep the Client updated.

10 Amendments to this Policy

- 10.1 The Company reserves the right to review and amend this Policy from time to time for any reason and notify the Clients of any such amendments accordingly by posting an updated version of this Policy on the Company's website(s). The Company will notify Client about any material changes to this Policy by placing a notice on its website or by communicating with him directly.

10.2 The Client is responsible for regularly reviewing the Policy and any amendments thereof.

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