



MasadaMarkets



# PRIVACY POLICY

Version 1

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## 1. INTRODUCTION

Masada Markets, having its address at 10th Floor, Sterling Tower, 14, Poudriere Street, Port-Louis, Mauritius, a company regulated by the Mauritius Financial Services Commission (FSC) under Investment Dealer's License N° GB23202128 (hereinafter referred to as the "Company") collects, uses, and manages personal information received from Clients in connection with the provision of services.

In accordance with the Mauritius Data Protection Act 2017, the Company views the protection, privacy, and safeguarding of clients' personal and financial information as a high priority.

One of the main priorities of the Company is the full security of Clients' information. The Company does not allow this information to become open to the general public or be used by third parties. The Company does not provide, sell, disclose, or temporarily give Client information and account details to third parties. The Company values its reputation and respects its Clients.

## 2. COLLECTION OF DATA

By opening an account, the Client agrees to and accepts all the provisions set forth in this Policy.

To open an account with Masada Markets, the Client must first register on the Company's website by providing the required information, including: full name, date of birth, country of residence, complete address, phone number, and city code. This information is provided during the registration process through the Personal Area. Gathering information is a necessary condition for establishing a business relationship with the Company.

## 3. PERSONAL DATA COLLECTED BY THE COMPANY

Personal data provided by Clients includes:

- Information provided by the Client during registration (full name, date of birth, country of residence, complete address, phone number, and city code).
- Documents verifying the Client's Personal Area, including government-issued identification (passport, national ID, driver's license) and documents confirming residence (utility bill – gas, water, electricity, bank statement, or other government-issued documents).
- Documents confirming money transfers, if applicable.
- Any other legally required information to identify the Client.

**Note:** If you decide not to provide some data from this list, we may not be able to provide you with some requested services

## 4. USE OF INFORMATION

Information given by the Client is used to provide quality services. For example, the Client's contact information may be used in case the Company needs to contact the Client urgently or to inform the Client about any Company's updates and news.

Client's data is used to confirm the client's identity, to open trading and/or partner accounts, to quickly inform about new services of the Company, to maintain the database of customers' accounts, and to analyze statistical data for providing services and products of higher quality.

Personal data given by the Client can also be used for the following purposes:

- Legal compliance;

- Performance of contractual obligations;
- Marketing purposes.

## 5. INFORMATION PROTECTION

The Company uses advanced technology to provide the security of personal data. The Company has put in place appropriate security measures to prevent accidental loss, use, unauthorized access, modification or disclosure of personal data. The Company employees maintain strict standards in the process of transferring information within the Company.

The Company limits access to your personal data to those employees who require access to limited data of Clients and only specific categories of employees have full access to personal data of Clients (e.g. verification or account managers).

Any information and access will be encrypted using SSL technology. Where the Company has given to the Client (or where the Client has chosen) a password which enables the Client to access certain parts of the Company's website, the Client is responsible for keeping this password confidential. The Company will not ask the Client to share their password with anyone.

## 6. RETENTION PERIOD

The retention period for personal data storage is 7 years. After the retention period has passed, the Company has the right to remove all data, which was received from the Client when it considers that personal information is no longer necessary for the purpose for which it was collected.

The Company may keep personal data for longer than 7 years for legal, regulatory, or technical reasons.

## 7. DISCLOSURE OF INFORMATION TO THIRD PARTIES

The Company will not rent or sell information about the Client to third parties outside the Company without the consent of the Client.

The Company may provide information about the Client to third parties only under special circumstances. Such circumstances may be:

- Protection of personal rights and property in the court;
- Implementing the court orders;
- Providing information to law enforcement authorities at official request;
- Transferring of information to business partners (trustees) to improve the quality of service.

In order to give the Clients comprehensive, high-quality service, the Company may at times enter into partnerships and alliances which may include joint marketing and affiliate agreements with other companies who offer products and services that might be of value to the Company's clients, the Company may exchange personal data with its partners.

However, the use of Client's personal data is limited to sharing the account number with one of the partners at their request. On certain occasions, full personal information will be shared to improve the quality of service. At the request of the Client, the Company can provide information about the services that the partners provide for it.

You agree that we will disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case personal data about its customers will be one of the

transferred assets. You also agree that we will share your personal information with third parties for verification purposes.

Any third party using the personal data of clients must abide by the provisions of this policy.

## 8. CHANGES IN PERSONAL OF INFORMATION

Because the Company assumes that all the information is full and relevant, the Company asks the Client to notify the Company of any changes in the personal data via the appropriate forms of the Personal Area.

## 9. RIGHTS OF THE CLIENT

Every Client has the following rights regarding the processes of collecting, using, and managing his/her personal information:

- the right to be informed. The Company describes the procedure for processing personal data in this Policy. We have tried to make this Policy easy and understandable for our Clients, but if you have any inquiries regarding this Policy or your rights, or if you need additional information, you can email us at [support@masadamarkets.com](mailto:support@masadamarkets.com)
- A client has the right to request a copy of all the information the Company holds of them. A fee might be charged for providing this. A client also has the right to have any inaccuracies corrected, the right to object to the use of their data, and the right to block any specific uses of their data by the Company by means of a request in writing to the customer service team at [support@masadamarkets.com](mailto:support@masadamarkets.com)

## 10. RESTRICTION OF RESPONSIBILITY

If at any time client choose to purchase a product or service offered by another company, any personal information shared with that company will no longer be controlled under our Privacy Policy.

The company is 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 client or collected by those sites.

Whenever Client elect to link to a co-branded Web site or to a linked Web site, he/she may be asked to provide registration or other information. Please note that the information he/she is providing is going to a third party, and client should familiarize themselves with the privacy policy provided by that third party.

## 11. RECORDING OF TELEPHONE CALLS

The Company may monitor or record phone calls with you in case we need to check if we have carried out your instructions correctly, to resolve any queries or issues, for regulatory purposes and to help improve our quality of service and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

## 12. UPDATES TO THE POLICY

From time to time, the Company has the right to update this Policy to ensure that any new services, requirements, and technologies, as well as any changes to our business operations, are taken into consideration, as well as any changes to legislation.

In case of any updates to this Policy, the Company will post the changes to this Policy and inform Clients via the Company's website and/or by sending an email.