



**Grand Capital**

**PRIVACY POLICY**

**Grand Capital Ltd.** (hereinafter – “GRAND CAPITAL” or “we” or “the Company”) is incorporated under the laws of Saint Vincent and the Grenadines with Registration No. 24648 IBC 2018, having its registered office at Suite 305, Griffith Corporate Centre, P.O. Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines. GRAND CAPITAL 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. The Company is committed to maintaining the accuracy, confidentiality and security of your personal information. GRAND CAPITAL’s privacy policy may be updated in the future if there are any changes to the regulatory framework. We are bound by the Data Protection Principles which form the core framework of the General Data Protection Regulation (CDPR).

## **WHO DOES THE GRAND CAPITAL LTD. PRIVACY POLICY APPLY TO?**

All customers of Grand Capital Ltd., and its subsidiaries, affiliates or associated companies.

## **WHAT IS PERSONAL INFORMATION?**

For the purposes of this Privacy Policy, Personal Information is any information about an identifiable individual, other than an individual’s business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities (hereinafter: "Personal Information").

## **HOW WE PROCESS YOUR PERSONAL DATA?**

We process your personal data either manually or automatically by means of collection, recording, systemization, accumulation, storage, specification (update, modification), retrieval, usage, transfer (provision, access), depersonalization, blocking, deletion, destruction and other operations on personal data, which are allowed under applicable data protection law.

## **WHAT PERSONAL INFORMATION DO WE COLLECT?**

We only collect personally identifiable information that you voluntarily and knowingly provide us. We collect and maintain different types of Personal Information in respect of the individuals with whom we interact. This information includes, but is not limited to:

1. Personal information that you indicate in statements, questionnaires and forms for opening an account, such as your name, date and place of birth, citizenship, nationality, home address, passport/ ID number, tax residency, tax identification number, occupation and position, contact details (telephone, email) and information on whether you hold/held a prominent public function, location information, and any recorded communications.
2. Financial information such as your investment experience, your income, digital wallets information, source of funds and investment objectives.
3. Documents that verify your identity and residency such as an international passport or national ID and utility bills or bank statements.
4. Documents provided for verification of money transfer: money orders, bank statements, credit card copies, etc.
5. Any other information described in this Privacy Policy.

Occasionally, GRAND CAPITAL may request further information for the purposes of both helping further improve the services it provides and in order for the company to be able to personalize the content and experience of the user on GRAND CAPITAL’ website.

GRAND CAPITAL does not provide any services to children, nor processes any personal data in relation to children, where ‘children’ are individuals who are under the age of eighteen. Therefore, the Company does not knowingly or specifically collect children’s personal data. If the Company collects such data mistakenly or unintentionally, the Company shall delete the information at the earliest possible once it obtains knowledge thereof. If the Company has to collect such data for any reason, it should require child’s parental consent.

## **WHY DO WE COLLECT PERSONAL INFORMATION?**

GRAND CAPITAL collects Personal Information to enable us to manage, maintain, and develop our operations, including:

- 1) to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you; the products and services that have been requested, in order to verify the your identity and carry out any required credit checks; to ensure that you meet the suitability requirements to use the company's products and services; to open and to manage your account; to process your transactions and to send you any information about transaction and post-transactions services; to manage our business operations and comply with internal policies and procedures.
- 2) to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services; to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services; for the analysis of statistical data which helps us in providing our clients with better products and services in the future.
- 3) to enable us to comply with applicable law or regulatory obligations, including: banking and financial regulations with which we are in compliance with prevention of money-laundering and financing of terrorism; tax law; reply to an official request from a duly authorised public or judicial authority, to ensure compliance with KYC and AML regulations.
- 4) to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- 5) to enable us to undertake our environmental, health and safety activities, including incident planning, response and investigation; to identify, prevent and investigate fraud and other unlawful activities, unauthorised transactions and other liabilities and manage risk exposure; to defend, investigate or prosecute legal claims; to receive professional advice (such as legal advice).
- 6) we may use your IP address to help diagnose problems with our server, to administer our websites, and to gather broad, aggregated demographic information about you. Our websites may use cookies to deliver content specific to your interests, to save your password, to find your account information in our database when you access a service so you do not need to log in at every visit. Our website uses cookies to distinguish the clients from each other in our website. This helps us to provide you with a good experience when they browse our website and also allows us to improve our site.
- 7) for the purposes stated in this Privacy Policy and any other reasonable purpose to which you consent.

We may also deidentify or anonymize information about our customers to identify trends, manage our business, develop statistical information, understand how we are performing, or develop relevant products services or offers. Use of deidentified information may also be shared with third parties for other analytical purposes. Deidentified or anonymized information will not personally identify any individual and therefore is not subject to this policy.

If you provide to us personal data that is considered sensitive (e.g. information on your health, racial or ethnic origin, political opinions, religious or other beliefs, membership or otherwise of a trade union or condition or sexual life), your consent will be the legal basis for processing your personal data.

The choice to provide GRAND CAPITAL with your consent to the collection, use, and disclosure of your personal and account information is always yours, however, your decision to withhold such consent may limit our ability to provide you with certain products, services, or offers.

If you do not provide the requested personal data, GRAND CAPITAL may be unable to offer you with our products and/or services.

## **HOW WILL GRAND CAPITAL COLLECT PERSONAL INFORMATION?**

We will generally endeavor to collect personal information directly from you through a number of ways:

- 1) when you to provide personal information voluntarily: you may give us your identity, contact and financial data etc. by filling in forms or by corresponding with us by post, phone, e-mail, online chat or otherwise. This includes personal information you provide when you apply for our products or services, create an account on our website, subscribe to our or related third party service or publications, to subscribe to marketing communications

from us, and/or to submit enquiries to us, enter a competition, promotion or survey, give us some feedback, transactions made online in relation to the provision of services by GRAND CAPITAL.

2) when you visit our website, we may collect certain information automatically from your device. The information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked. Some of this information may be collected using cookies and similar tracking technology, which are addressed further below in this Policy.

3) we may collect information about you from third party sources. For example, we may collect information about you from credit reporting agencies, those who you have authorized to disclose your information to us, government agencies or publicly available information or other public sources. We may also collect information from third parties, brokers, traders, funds, agencies or other companies and affiliates, to fulfill any special offers or customer requests, manage credit or other business risks, collect outstanding debt.

## **HOW DOES GRAND CAPITAL OBTAIN MY CONSENT TO USE OR DISCLOSE THAT INFORMATION?**

By agreeing to accept this Privacy Policy or by registering an account on the GRAND CAPITAL's website, your (the client/website user) consents to GRAND CAPITAL to process their personal data only for the purposes stated in this Policy. Your consent to the collection, use, or disclosure of your personal information may be implied or express.

In the cases where GRAND CAPITAL requests a consent for special (sensitive) personal data, this will always be explained to the client - the reasons for such data collection and how specifically that information will be used.

We may obtain your express consent to the collection, use, and disclose your information in one of the following ways: in writing, by electronic confirmation via the internet; or verbally, where an audio recording of the consent is retained by us; or through other methods, as long as a record of your consent is created by you, by us, or by a third party acting on our behalf.

## **DOES GRAND CAPITAL USE COOKIES OR OTHER WEB TECHNOLOGIES TO COLLECT INFORMATION?**

Cookies are text files of letters and numbers that are stored on your browser ('session cookies') or the hard drive of your computer ('persistent cookies') if you agree. They are used to improve your experience, make the website work, enable site security and provide the business with marketing information about the site's visitors. Our website uses cookies to provide the functionality you need to browse our site correctly. We issue cookies upon landing on our website, unless you have changed cookie settings in your browser to refuse cookies.

Please note that:

- with cookies switched off, some areas of our website and services will not be made available to you.
- not all the cookies on our sites are set by us.

### **What types of cookies are there?**

- **Session cookies** save website 'session' credentials for visitors both logged in and not logged in. Once the browser is closed, the cookie is deactivated – and the session closed.
- **Analytical cookies** collect visitor information, such as the number of visits, how our website was found, from where the visit came from, if via a marketing campaign etc. This information is extremely important to the business and helps us improve our website and further enhance visitor experience.
- **Functional cookies** are specifically about visitor experience on the website. For example they 'remember' the open/closed status of messages, enabling access to information stored when registered with GRAND CAPITAL and so on. Without these functional cookies, no settings information can be saved.
- **Third Party cookies** are set by other websites who place cookies on your computer. The "3rd party" cookies are placed when you are logged into their services, and GRAND CAPITAL does not control the dissemination of these cookies. These cookies are session, analytical and functional, and determine if you

are logged into a social network already, and control bookmarking or sharing GRAND CAPITAL content. Third parties should be contacted directly to view their cookie privacy information.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose	More info
<b>SnapABugChatWindow</b>	Windows settings for online chat	<a href="https://help.snapengage.com/live-chat-cookies/">https://help.snapengage.com/live-chat-cookies/</a>
<b>SnapABugHistory</b>	keep track of the visitor visits and last chats to present history to agent	<a href="https://help.snapengage.com/live-chat-cookies/">https://help.snapengage.com/live-chat-cookies/</a>
<b>SnapABugRef</b>	tracking of origin and site entry	<a href="https://help.snapengage.com/live-chat-cookies/">https://help.snapengage.com/live-chat-cookies/</a>
<b>SnapABugVisit</b>	detection of new session	<a href="https://help.snapengage.com/live-chat-cookies/">https://help.snapengage.com/live-chat-cookies/</a>
<b>__cfduid</b>	<p>The __cfduid cookie is used to override any security restrictions based on the IP address the visitor is coming from. For example, if the visitor is in a coffee shop where there are a bunch of infected machines, but the visitor's machine is known trusted, then the cookie can override the security setting. It does not correspond to any userid in the web application, nor does the cookie store any personally identifiable information.</p> <p>Note: This cookie is strictly necessary for site security operations and can't be turned off.</p>	<a href="https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-CloudFlare-cfduid-cookie-do-">https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-CloudFlare-cfduid-cookie-do-</a>
<b>_ga</b>	<p>Google Analytics is a simple, easy-to-use tool that helps website owners measure how users interact with website content. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use HTTP Cookies to "remember" what a user has done on previous pages / interactions with the website.</p>	<a href="#">More info</a>
<b>csrftoken</b>	Prevents CSRF (Cross-Site Request Forgery) attacks against the website	<a href="https://grandcapital.net/">https://grandcapital.net/</a>

<b>sessionid</b>	Associates browser with a Member's Area session, allows to use all the features of the website	<a href="https://grandcapital.net/">https://grandcapital.net/</a>
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## **DOES GRAND CAPITAL USE AUTHOMATED DECISION-MAKING?**

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you. Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without human review.

We make automated decisions at account opening, where we check that the offered products or services are appropriate for you based on the information you provide to us. When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You may be required to prove your identity for us to service you.

## **WHERE WILL MY PERSONAL INFORMATION BE STORED?**

Account and personal information about our customers may be stored or processed in or outside your place of residence. Your personal data may be transferred to third countries outside of the European Economic Area, to recipients mentioned in this Privacy Policy, in connection with the purposes set out in this Privacy Policy. We may transfer your personal data to countries that may have different laws and data protection compliance requirements; however, processors in third countries are obliged to comply with the European data protection standards when processing your personal data. Where we transfer your personal data to third countries, we do it on the basis of standard contractual clauses adopted by the European Commission.

## **WHAT CAN GRAND CAPITAL DO WITH MY PERSONAL INFORMATION?**

Depending on the product or service concerned and with particular restrictions on confidential information, your personal data and information may be disclosed to:

- 1) subsidiaries, affiliates or associated companies of GRAND CAPITAL and trusted third parties which directly support our promotional activities, in order for them to assess your eligibility for their products or services; to directly provide you offers about their products or services; to confirm or authenticate your identity and ensure they have your correct and up-to-date information; to manage GRAND CAPITAL credit risk or other business risk; to better understand your needs and to serve you better; to process any offers or loyalty credits; or to detect, prevent, manage, and investigate fraud or other unauthorized or illegal activity.
- 2) Trusted third parties to help us process and analyze your personal data, to give us insights about you that we can use to improve our advertising, products and services, and to track the effectiveness of a particular promotion or campaign; If you purchase Services from us, trusted third parties to allow delivery of the Services you have ordered. Third party suppliers of services which you purchase through our sites. service providers and specialist advisers who have been contracted to provide DF Markets with administrative, financial, legal, research, or other services.
- 3) Social media platforms (e.g. Facebook, Instagram) so that they can help us deliver our advertisements directly to your social media page or mailbox.
- 4) courts, law enforcement and regulatory authorities, in accordance with or as prescribed by law; to another organization for fraud prevention, detection, and investigation if seeking consent from you would compromise the investigation; upon an official request by a national or international government agency and upon a subpoena by a court of law, and to parties collecting outstanding debt upon a subpoena by a court of law; to certain regulated professionals such as lawyers, notaries or auditors.
- 5) anyone duly authorised by the client, as specified by that individual in writing or under a contract.

## **WILL GRAND CAPITAL USE MY INFORMATION FOR DIRECT MAILINGS OR OTHER COMMUNICATIONS?**

GRAND CAPITAL may send you information about other products or services that we, or our affiliates or partners, primarily by email, in order to provide you with information concerning products and services that may be of interest to you. Please note that in accordance with the applicable law, the processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest pursued by the us. If you do not wish to receive marketing communications from us, you can opt out at any time by sending an email to our Data Protection Officer. After you unsubscribe, we will not send you further promotional emails, but we will continue to contact you to the extent necessary for the purposes of any services you have requested.

## **HOW LONG WILL GRAND CAPITAL RETAIN MY PERSONAL INFORMATION?**

GRAND CAPITAL will only retain your account or personal information for as long as necessary to fulfill the purpose we collected the information, or for sufficient time to allow you access to the information if it was used to make a decision about you or your account. Once we no longer require your account or personal information it will be destroyed or de-identified. We may keep your data for longer if we cannot delete it for legal or regulatory reasons, or otherwise requested by a competent authority.

## **YOUR PERSONAL DATA RIGHTS**

You have the following rights regarding your personal data we control and process:

- 1) The right to request access to, or copies of, your personal data, together with information regarding the processing of those personal data. You have the right to obtain your personal data in a commonly used electronic format. In the cases whereby the right of access granted to an individual may also lead to disclosure of personal data of third parties, we are obligated to provide to the relevant client access only to the part of the data referring solely to them.
- 2) The right to request rectification of any inaccurate or incomplete personal data concerning you.
- 3) The right to request, on legitimate grounds and where there is no good reason for us continuing to process it, erasure or removing of your personal data. We shall no longer process your personal data, unless we demonstrate compelling legitimate grounds for the processing. You also have the right to object where your personal data are processed for direct marketing purposes and we shall stop the processing of your personal data for such purposes.
- 5) The right to request restriction of processing of your personal data if: your personal data is not accurate and we need to stop processing it until we verify it; your personal data has been used unlawfully; we no longer need your personal data for the purposes of the processing, but you want us to keep it for use in possible legal claims; you have already objected to the processing of your personal data and you are waiting for us to confirm if we have legitimate grounds for the processing of your data.
- 6) The right to have your personal data transferred to another controller, to the extent applicable.
- 7) The right to withdraw your consent, where we process your personal data on the basis of your consent. Please note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn by you.
- 8) The right to be free from decisions based solely on automated processing of your personal data, including profiling, that affect you, unless such profiling is necessary for entering into, or the performance of, a contract between you and the Company or you provide explicit consent.
- 9) The right to lodge a complaint regarding the processing of your personal data by us. If you feel that your concerns have not been adequately addressed by us, you have the right to report it to the relevant data protection authority.

To exercise any of the above rights, the Client may contact the Company at [n.lutovinov@grandcapital.net](mailto:n.lutovinov@grandcapital.net). Please note that if you wish to exercise any of the rights listed above, we may not be able to provide you with information about services and/or products requested by you, and also the products and services themselves; and with regard to this, we will have no liability to you in respect of the same.

## **HOW WILL GRAND CAPITAL ENSURE MY PERSONAL INFORMATION IS KEPT SAFE?**

GRAND CAPITAL has rigorous security and safeguard processes and procedures in place, to ensure that any account or personal information of our clients remains safe from theft, loss, or unauthorized access. Your non-public information and personal data are kept in a secure and strictly confidential manner; they are accessed and used only by employees who service your account, as well as by employees who exercise control functions.

For example, we use ID validation process as part of our ongoing corporate efforts to protect your personal information associated with your account(s). By requesting information from you upfront (e.g. name, phone number and date of birth or other identification), GRAND CAPITAL can confirm that we are in fact communicating with you or an authorized person to act on your behalf.

We use advanced security software and technology to ensure a safe and secure trading environment and to protect your non-public personal, financial and trading information. We encrypt all client personal data in order to be able to protect these data to the fullest extent possible.

Our processes assist in the prevention of any unauthorized access to your account information that may arise from attempts to commit fraud or identity theft. GRAND CAPITAL may change this ID validation process from time to time as industry best practices evolve.

### **WHAT ARE MY OPTIONS IF I WANT MORE INFORMATION ABOUT PRIVACY?**

GRAND CAPITAL makes its privacy policy available online at <https://grandcapital.net>. We have also appointed a member of our team to be held accountable for our privacy policy. Do not hesitate to contact us regarding a privacy policy questions, concerns, or complaints about how we collect, use, or disclose your personal information.

#### Data Protection Officer Contact Details

You can contact our Data Protection Officer at:

Email: [n.lutovinov@grandcapital.net](mailto:n.lutovinov@grandcapital.net).

We'll be glad to answer any questions related to this Policy by email: [info@grandcapital.net](mailto:info@grandcapital.net).

### **LAW AND JURISDICTION**

This Policy shall be governed by and construed in accordance with the laws of the Sent Vincent and the Grenadines, and any disputes relating to this Policy shall be aimed to be resolved between the parties acting in good faith, and in case of failure to do so, they shall be subject to the jurisdiction of the Sent Vincent and the Grenadines courts.