Privacy Policy

INTRODUCTION

In order for Synesis Markets LTD (the “Company” or “we” or “us” or “our”), to provide you with our service we are required to collect and process certain personal data about you and your activity. This Policy explains how the Company gathers, processes, uses, stores and disclosed your Personal Information in compliance with the Mauritius Data Protection Act 2017, applicable FSC requirements and other applicable privacy laws, as well as international best practices.

By entrusting us with your personal data, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this data.

We encourage you to review the following information carefully.

Grounds for data collection

Processing of your personal information (meaning, any data which may potentially allow your identification with reasonable means; hereinafter "Personal Information") is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

How do we receive information about you?

We receive your Personal Information from various sources:

1. When you voluntarily provide us your personal details in order to create a trading account with the Company (for example, your name and email address);

2. When you use or access our site and services, in connection with your use of our services (for example, your financial transactions);

3. From third party providers and services, such as credit reference agencies, fraud prevention agencies, identity verification vendors, banks, authentication service providers and public registers.

What type of information we collect?

In order to open a trading account with us, and in order to provide you with our services we will need you to collect the following information:

- Personal Information
  We collect the following Personal Information about you:
  - Registration information – your name, email address, phone number, occupation, country of residency, and your age (in order to verify you are over 18 years of age and eligible to participate in our service).
  - Voluntary information – when you communicate with us (for example when you send us an email or use a “contact us” form on our site) we collect the personal information you provided us with.
  - Financial information – by its nature, your use of our services includes financial transactions, thus requiring us to obtain your financial details, which includes, but not limited to your payment details (such as bank account details and financial transactions performed through our services).
  - Technical information – we collect certain technical information that is automatically recorded when you use our services, such as your IP address, MAC address, device approximate location

- Non-Personal Information
  We record and collect data from or about your device (for example your computer or your mobile device) when you access our services and visit our site. This includes, but not limited to: your login credentials, UDID, Google advertising ID, IDFA, cookie identifiers, and may include other identifiers such your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us.
  If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

Tracking Technologies

When you visit or access our services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies ("Tracking Technologies"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our services, improve our site’s performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information.

How do we use the information we collect?

- Provision of service - we will use your Personal Information you provide us for the provision and improvement of our services to you.
- Marketing purposes - we will use your Personal Information (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Information, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the “unsubscribe” link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us.

  Opt-out of receiving marketing materials - If you do not want us to use or share your personal information for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your personal information with third parties for nonmarketing purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your personal information are authorized to use your Personal Information only as necessary to provide these non-marketing services.
- Analytics, surveys and research - we are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyse the information we have to develop, evaluate and improve these features.
- Protecting our interests - we use your Personal Information when we believe it’s necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of the Company its users and/or partners.
- Enforcing of policies - we use your Personal Information in order to enforce our policies, including but limited to our Terms or Client Agreement
- Compliance with legal and regulatory requirements - we also use your Personal Information to investigate violations and prevent money laundering and perform due diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

With whom do we share your personal information?

- Internal concerned parties - we share your information with companies in our group, as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services.
- Financial providers and payment processors - we share your financial information about you for purposes of accepting deposits or performing risk analysis.
- Business partners - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- Legal and regulatory entities - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of the Company, its users and/or partners. We may also disclose your personal information where requested by our supervisory authority (the Financial Services Commission of Mauritius), or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as an Investment Dealer.
- Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

How we protect your information

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. Your information is stored on secure servers and isn't publicly available. 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.

You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to

protect your Personal Information, we cannot ensure or warrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. 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 as required by applicable laws and regulations.

Unsolicited advertising

The Company shall not initiate contact with any individual that has not explicitly accepted the company's Terms and Conditions. This includes, but is not limited to, unsolicited advertising through communications via email, phone, text message, social media, or other digital or physical channels. The company recognizes and respects the right of individuals to privacy and strictly adheres to all applicable anti-spam laws and regulations, including the prohibition of unsolicited commercial messages.

All communications must clearly disclose the Company's identity. The Company shall apply a strict anti-spam policy and shall never use spam email techniques in marketing material.

Personal Data and other websites

We are not responsible for the privacy policies and practices of other websites, even if you accessed a third-party website using links from our website. We recommend that you check the privacy policy of each website you visit and contact the owner or operator of that website if you have concerns or questions about its collection and processing of personal data.

Complaints

If you have a complaint about how we handle your Personal Data, you should contact us using the details in this Privacy Policy. We will acknowledge your complaint promptly in line with our Complaints Policy and aim to resolve it within 45 days. If you are not satisfied with our response, you may escalate the matter to the Data Protection Commissioner or the Data Protection Office in Mauritius, the

Financial Services Commission in Mauritius, or any other relevant supervisory authority in your jurisdiction. We take all complaints seriously and will work with you and, if necessary, regulators to resolve issues relating to your privacy.

HOW TO CONTACT US?

If you decide to terminate your account or wish to complain about matters relating to this Policy, you may do so by emailing us at support@synesis.markets. If you terminate your account, please be aware that personal information that you have provided us may still be maintained for legal and regulatory reasons (as described above), but it will no longer be accessible via your account.

Updates to this Policy

This Privacy Policy is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website. You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.