



## Privacy Policy

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## 1. INTRODUCTION

Protection of the personal customer information is a key responsibility and obligation of Gilgamesh Financial Services and/or GFX Securities and/or the Company (the “Company”) management. This Privacy Policy outlines the procedure of collection, protection, keeping and use of customers’ personal data.

## 2. COLLECTION OF DATA

The Company will be collecting personal data which is provided by a customer explicitly and knowingly. For the purpose of opening an account at the Company’s trading platform, each customer must provide his/her Personal Data consisting of:

- Full name;
- Residential address;
- Employment details;
- Average income;

- Other personal details (upon necessity and request).

### 3. USE OF DATA

The Company may process Personal Data of a customer on the following bases and for the following purposes:

- To carry out obligations arising from any agreements between a customer and the Company.
- For notifications about changes of products and/or services, as well as other important alterations affecting performance of an agreement between a customer and the Company.
- For notifications about products and/or services of a Company. A customer must give his/her explicit consent to receive such information.

If the Customer is asked to provide Personal Data to comply with legal requirement or to conclude an agreement between the Customer and the Company, the Company shall make it evident and advise the Customer regarding the purpose of collection of Personal Data.

### 4. PROTECTION OF DATA

The Company will keep Personal Data of customers for a period of time upon its own discretion. The information will be used for updating a customer about products and/or services of the Company. A customer has the right to request the termination of receiving such updates, by informing the Company about his/her intent.

The Company is obliged to put maximum efforts to ensure security of personal data and other confidential information received from its customers, and adhere to rules of internal use of such information.

The Company has the right to share Personal Data to the following categories of recipients:

- Any Group Company: we may make Personal Data available to any member of our group, which means any subsidiary company or holding company, and/or any subsidiary company of such holding company (the Group). This may be necessary to provide customers with or administer our products, services,

customer and technical support. All of our employees and contractors are required to follow our privacy and security policies when handling personal data.

- Third party service providers: We may share Personal Data with our third-party service providers so that they can support our products and services, such as system and platform maintenance services, conducting customer due diligence or credit checks, collecting customer feedback, marketing and advertising services, and data analytics and search engine services. Our third-party service providers are permitted to use Personal Data only for the purpose of providing services to us and may not otherwise share or use your personal information.
- Fraud prevention and credit reference agencies: We may share Personal Data with our third-party service providers to conduct anti-money laundering, fraud, sanctions, credit risk and customer due diligence checks, credit reference checks and fraud prevention checks.
- Introducers and advisers: We may disclose Personal Data to an introducer if they directed the customer to us.
- Courts, regulators and law enforcement agencies: We will share Personal Data when we believe it is required to comply with applicable legal or regulatory obligations and to respond to requests from government authorities, including law enforcement or financial regulators. This may include authorities outside the customers' country of residence.
- Other third parties: We may share Personal Data in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock. If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information.

Personal Data is stored in the servers of the Company in electronic form. When Personal Data is no longer required to be kept, it will be destroyed by using destruction/deletion methods that would prevent unauthorized third parties from gaining access to such data during and after destruction/deletion process.

It is considered a customer's responsibility to maintain confidentiality of his/her user ID and login.

## 5. COOKIES

The Company uses Cookies for its website. Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer. Cookies may be used on some pages of the Site for us to provide Site users with a more customized web browsing experience.

## 6. CUSTOMER CONSENTS & RIGHTS

By accessing the website of the Company, a customer consents to the Company collecting, using, maintaining and disclosing of his/her personal data in accordance with the above provision of the privacy policy.

The Customer has the following rights:

- To request and obtain a copy of the Personal Data the Company holds about his/her;
- To request for amendment and/or correction of any incorrect or incomplete data. The Company will be then obliged to fulfil the request (either to complete or amend the data) and notify any relevant third parties who such data was transmitted to;
- To request that the Company stops processing his/her Personal Data. The Customer, therefore, acknowledges that refusal from processing his/her Personal Data may affect the provision of some services of the Company;
- To request to erase Personal Data from the records of the Company. The Company shall fulfil the request, unless there is a lawful reason not to do so;
- To lodge a complaint to the supervisory authority - although we would prefer if the Customer first contacts us so that we can try and resolve the complaint to the satisfaction of the Customer and ensure that reasons for potential future complaints are investigated by us.