

Finvestus Privacy Policy

Last Updated: June 1, 2020

This privacy policy (the “**Policy**”) explains how Finvestus Inc., and/or additional Finvestus Group entities to whose services/website you have registered (collectively “**Finvestus**”, “**we**” or “**us**” and the member of the Finvestus group to whose services you registered, the “**Finvestus Entity**”) collects, uses and discloses personal information through its websites, mobile applications, and other online products and services that link to this Policy (collectively, the “**Services**”) or when you otherwise interact with us.

We encourage you to read the Policy carefully as it forms part of the relevant Finvestus Entity’s terms and conditions, terms of business and/or terms of use, as the case may be.

Application of this Policy

For the purposes of applicable international data protection laws, the respective Finvestus Entity with whom you have registered is the “controller” of personal information collected through www.finvest.us (<http://www.finvest.us>), other Finvestus Group entities’ websites, widgets, mobile applications and other platforms (together the “Site”), and is the company to contact if you have questions about the use of your personal information (see the “Contact Us” section below). The Policy also applies to personal data about each authorized representative of a client and about other persons or entities collected in the course of providing our services (such as directors of corporate clients).

Collection of Information

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you create a Finvestus account, participate in any interactive features of the Services, fill out a form, participate in a contest or promotion, make a purchase, apply for a job, communicate with us via third party social media sites, request customer support, or otherwise communicate with us.

When You Sign Up or Register for a Finvestus account or Services

If you sign up for a Finvestus account or Services, we will collect basic information about you including your name, email address and telephone number. You may provide this information to us directly, or by signing in to your account/service with a third party, including without limitation, Facebook or Google (see “Information We Collect from Other Sources” below). We will use the information that we collect about you to:

- Create and maintain your account;
- Allow you to log in to Finvestus;
- Contact you about your account and/or the services that Finvestus offers.

When You Provide Information to Build Your Profile

Once you have created a Finvestus account, we will ask you to provide additional optional information about yourself to complete your “Profile”. The information we ask for may include your gender, date of birth, place of birth, addresses, nationality, national insurance number (or other government- issued identification number), citizenship and residency status, Tax ID, and information about your experience trading, education, source of income, investment aims and appetite, occupation, employer and employment position, annual income, investment portfolio, total cash and liquid assets and other details or questions as may be required in the Profile creation and the process may be amended by us from time to time.

We will also ask you to provide a copy of an identification document, such as a passport, residency, visa or national identity card, a utility bill and such other documents as may be required by us in order to comply with our regulatory obligations and to verify your identity. Further details about the identification process can be found in the relevant Finvestus Entity’s terms and conditions, terms of business and/or terms of use, as the case may be. We will use the information you provide in your Profile to:

- verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, “know your customer”, anti-money laundering, fraud, sanctions and politically exposed person checks;
- contact you on matters related to your account, including, to request any additional information or documentation;
- provide you with notices related to your account, general updates, market updates and other marketing materials, including, the Services offered by members of the Finvestus Group
- tailor the products and services offered through the Site to you, including without limitation, to perform any suitability or appropriateness assessments for using our services and/or products, such as our high-leveraged trading services and Social Trading Features; assess your credit risk;
- assess your risk score according to parameters determined by Finvestus; assess whether you qualify as a professional client, wholesale client or other specific category of clients; maintain administrative records relating to our business; and
- set up security measures to secure your account, including without limitation, to carry out two-factor authentication.

You can update your Profile at any time by visiting the “Account” page in the Settings menu. We recommend that you update your Profile regularly, to ensure that the Finvestus functions offered to you are appropriate for your current circumstances. You further agree to update such information upon Finvestus’s request, if Finvestus considers the information provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our Services to your profile. You do not have to provide the information to complete your Profile, however if you choose not to, we may be unable to offer Finvestus’s full functionalities to you.

When you Contact Us

If you contact us by telephone, email, post or use another function offered by Finvestus, such as the chat feature, we will collect any information about the communication and any additional information that you choose to give us. We will use this information to review, investigate and

respond to any comment or question that you may raise. Please note that we record and retain all telephone calls and other communication with us and may use it in our dealings with you including any dispute resolution or legal proceedings.

When a Finvestus User Invites You to Use Finvestus

Users of Finvestus can invite their contacts to sign up for an account with us. We only collect the email addresses of individuals that users choose to invite to join Finvestus and Finvestus only uses the email addresses for sending an invitation to the individual at the request of the existing Finvestus user.

Information About Your Use of the Finvestus Services

Usage and Automatically Collected Information

When you access or use our Services, we automatically collect information about you, including:

Financial Information: We collect financial information related to your use of the Services

Log Information: We collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.

Device Information: We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

Activities on the Site: We collect records of activities on the Site, including, any content you post, your account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.

Location Information: In accordance with your device permissions, we may collect information about the geo-location of your device.

Information Collected by Cookies and Other Tracking Technologies: We use different technologies to collect information, including cookies and web beacons. You can find out more about Finvestus's use of cookies and similar technologies in our Cookie Policy.

Information We Collect from Other Sources

We may collect personal information about you from third party entities when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies. We may also collect information about you from third parties, when you use or connect to Finvestus by or through a thirdparty platform, such as Facebook or another site, you allow us to access and/or collect certain information from your Third Party Platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third party platform for their use.

We will share some of the information we collect from you on installation of the mobile app with vendors and other service providers who are engaged by, or working with, us in connection with the operation of the services we provide to you. This information may also be shared with these parties for analytics purposes, which may involve the reproduction and

display of your information in an aggregated and anonymized manner that will not in any way identify you.

Unsolicited Information

If you provide us with personal information that we have not requested then we will endeavour to only retain the information that we are otherwise entitled to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

Use of Information

We use the information we collect to provide, maintain, and improve our services, such as to administer and verify your account, to provide the services you request and customize your experience with us. We also use the information we collect to:

- carry out our obligations owed to you;
- comply with our regulatory and other legal obligations;
- monitor any content, you post;
- administer transactions including deposits, chargebacks and payments;
- monitor trading activity on Finvestus, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities;
- determine whether a payment method is being abused;
- compile statistical analysis of the pages of our platform and websites;
- monitor and analyse our business;
- investigate and to manage enquiries, disputes and legal proceedings and to comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;
- provide information about you and your trading with Us to credit reference agencies;
- participate in crime prevention, legal and regulatory compliance and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement, even if not compelled to do so;
- develop and to market other products and services; and
- novate, transfer to assign any of the rights or liabilities of the Finvestus Entity.

Sharing of Information

We will not share the personal information we hold about you except in the following circumstances:

- between and among Finvestus and the Finvestus Entity and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- with professional advisors, vendors, consultants, and other service providers, such as payment service providers, IT hosting companies, banks, other financial institutions and credit reference agencies who need access to such information to carry out work on our behalf;
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of Finvestus by another company;

Disclosure in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;

if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of Finvestus or others; or

where we have your consent. For example, if you use the “Finvestus connect” feature, we will get your permission before sharing your personal information with a third party. We will ask for your explicit consent to share any sensitive personal information.

Social Sharing Features

If you have elected to use one of our applications provided via social networks (such as Facebook, Twitter etc.), our application will be granted access to your social network account general information which includes your name and username in the social network, profile picture, gender, networks, user ID, list of friends, and any other information you have permitted to be shared depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements about our products services on our behalf across the web and in mobile applications. This may involve cookies and other technologies to collect information about your use of the Services. This information may be used by Finvestus to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services, and better understand your online activity in connection with the Services. Please refer to our Cookie Policy for more information about the cookies involved and the process of consenting or refusing cookies. For more information about interest-based ads generally, please visit www.aboutads.info/choices if you are in the United States and if you are in the EU, please visit www.youronlinechoices.eu/.

Your Choices

Depending on where you or your data resides you may have certain rights and protections under the law regarding the processing of your personal data. For example, you may also have the right to object to, or request that we restrict, certain processing and in some circumstances to obtain a copy of the personal information in machine readable format.

Legal Basis for Processing: When we process your personal data we will only do so in the following situations:

- *Entering into and Performing the Contract with You:* If you have a Finvestus account or have registered on the Site or for the Services, our legal basis for processing your personal information is that it is necessary for the performance of the relevant Finvestus Entity’s terms and conditions, terms of business and/or terms of use, and to provide a service to you. With respect to a Finvestus account, this includes facilitating access to our platform, processing payments and executing trades.

- *For other Justifiable Grounds, including Legal Obligation and Legitimate Interests:* We process your personal information where necessary for Finvestus to comply with legal and regulatory obligations we are under, and also where it is necessary for legitimate interests we have in conducting our business. These include without limitation:
 - Learning about your interests and preferences to contact you with information that is relevant to you and helping us target marketing communication and advertisements for our products and services so that they are more relevant to you.
 - Using your pseudonymised details to show you advertising for our products and services on social media platforms, such as Facebook or via other third-party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
 - Analyzing and continually improving the Site and our services and helping us pilot test versions of the Site internally to develop new features and ensure the efficient running of Finvestus’s services.
 - Detecting and reducing fraud and credit risk.

Data Subject Requests: You have the right to access personal data we hold about you and to ask that your personal data be updated, corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you can log into your account or email us at privacy@finvest.us. If you wish to delete or deactivate your account, please note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

Questions or Complaints: If you would like to exercise any of these rights, you can log into your account or contact us. Any such request should be submitted in writing to: www.finvest.us/customer-service/. If you have a concern about our processing of personal data that we are not able to resolve, you may have the right to lodge a complaint with the relevant authority where you reside.

Promotional Communications

You may opt out of receiving promotional emails or text messages from Finvestus by following the instructions in those emails or text messages or by visiting the “Notifications” tab in the “Settings” menu on our platform. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

Mobile Push Notifications/Alerts

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

Automated Analysis of Your Personal Information

We use the personal information you provide to us, or that we gather when you use our services, to tailor Finvestus to your Profile and to assign you a risk score. Finvestus will carry out this analysis automatically, and in most cases without human intervention; the risk score does not have a legal or similarly significant effect for you. You can update the information in your Profile at any time by visiting the “Account” page in the Settings menu (and this may result in a different risk score). We recommend that you update your Profile regularly, to ensure that the Finvestus functions offered to you are appropriate for your circumstances. If you have any questions about the automated analysis of your personal information, please contact us (see “Contact Us” below). You may also find the calculation formula in the Site.

Transfer of Information to Other Countries

When using our services, your data is processed and stored in the EU and other countries. We and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it. We provide adequate protection for the transfer of personal data to countries outside of the EEA not recognized as providing adequate data protection through a series of intercompany agreements based on the Standard Contractual Clauses authorized under EU law. If you would like further information, you can contact us using the contact information below.

Finvestus Social Trading Platform

Finvestus is a real-time social trading platform, which integrates rich community and social characteristics into the trading platform. As part of the Finvestus traders’ network, traders who choose to be part of the community share their strategies and performance with the community. The amount traded is never disclosed and all these traders are required to agree to be part of the network and share their strategies and performance. Downloading, installing and accessing the Finvestus Services constitutes your agreement and acknowledgment that the following information and content shall be considered non-confidential and non-proprietary information (other than your personal data as described below), collectively, the “Content” and shall be publicly shown on the Site: your username and full name, your picture/avatar (if provided), your state of residency, gender, networks, list of users who follow you, users who copy you etc., list of users you follow or copy, and any network status/posts/blogs and any other content options that enable our users to interact amongst themselves, including without limitation content and information you post on the Finvestus community, comments, feedback, postings, “likes”, blogs and/or all information that You provide to us via our website, our mobile apps, and/or by email, chat, fax or telephone and/or any other means.

You can change your privacy settings at any time, and can make your trading activity private by clicking here: <https://www.finvest.us/settings/privacy> and <https://www.finvest.us/settings/notifications>.

Retention of Personal Information

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as

the requirements of any applicable law or regulation. For example, if you are invited to use Finvestus by another user, we will store your personal information for a period of six months in order to send an invitation to you by email. If you have an account with Finvestus, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us.

Security and Integrity of Information

We protect your personal information by using data security technology and using tools such as firewalls and data encryption. We also require that you use a personal username and password every time you access your account online. As set out in the relevant Finvestus Entity's terms and conditions, terms of business and/or terms of use, you must not share your password with anyone else. We restrict access to personal information at our offices so that only officers and/or employees with a legitimate business purpose can access it.

Minors

Finvestus is not available for users under the age of 18 (or the age of legal consent for the jurisdiction the user is located in) (a "Minor"). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us. If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at www.finvest.us/customer-service/.

Important Notice to Residents of the State of California

Natural persons who reside in the State of California should also review the Notice to California Residents. You may have additional rights under California law.

Changes to this Privacy Policy

The Policy will be reviewed from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. Any personal information held will be governed by our most current Policy. Links The Site may include links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such websites. Our terms of use and our Privacy Policy apply only to information collected by us in accordance with this Policy. Contact Us Should you have any questions regarding the Policy, please contact us at: privacy@finvest.us. Please include your name, and mailing or email address. We may require that you provide additional information to verify your identity before allowing you to exercise certain rights outlined above.