



GIV CAPITAL

PRIVACY POLICY



## PURPOSE OF THIS POLICY

This Privacy Policy (the "Policy") provides overview and explanation on how the GIV Capital ("GIV") collects, uses and treats the information you provide to us and the information we collect in the course of operating our business and our websites (regardless of where you visit it from).

## PRIVACY POLICY

This Privacy Policy is directed to natural persons who are either current and/or potential clients of GIV or are authorized representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or potential clients of GIV, whereby GIV will gather various types of information, which includes information identifying you as an individual, this is known as "Personal data" and/or "data". GIV is committed to protecting your personal data and respects your privacy.

In the course of our business, it is necessary to collect Personal Information about our potential clients. We take this activity seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices. Your Personal Information may be shared with a limited number of trusted partners and/or affiliates of GIV where such use is restricted to the management of your account and will not breach any elements of the EU General Data Protection Regulation (GDPR). If you have any questions or comments about GIV Capital Limited (Saint Vincent) Privacy Policy, you can contact our Customer Support Team: [support@giv-capital.com](mailto:support@giv-capital.com)

It is important that the personal data we hold about you is accurate, complete and true at all times, as such please do keep us informed if your personal data changes during your business relationship with any of the entities within the Group of Companies. In addition you provide your implied consent for data processing/transmission/record keeping/ as between the Group of Companies, wherever such entities may be located, registered and/or operating.

## PERSONALLY IDENTIFIABLE INFORMATION

Personal Data, or Personal Information, means any information that related to an identified or identifiable living individual. It does not include data where the identity has been removed (anonymous data). Information can have various ways of being obtained, including but not limited to a) information you provide us with and/or b) information that we collect;

If you open a trading account with GIV Capital, you will be asked for information regarding your name and address, employment and salary details. As part of the Money Laundering Regulations, and GIV Capital Limited (Saint Vincent)'s regulatory requirements, and GIV Capital policies and procedures, we are required to establish proof of your identity and address during the on-boarding stage. This process is conducted mainly by GIV Capital by requesting, and processing copies of your personal identifiable information, but also involves the use of third parties who conduct electronic verifications on our behalf. You might be asked to supply additional information to support any unsuccessful verification attempts. Where stated we may use the personal information you provide to contact you in the future about GIV Capital products and services. We only hold data which is necessary to offer the services provided on our website.

## PURPOSE OF DATA COLLECTION

When using the website as an example, details of your data are automatically registered by our server, such as your IP address, browser, the content you have visited, and how you landed on our pages, personal identification information, etc). In addition, we collect and store information such as your name, address, e-mail address, phone number, date of birth, gender and other data transmitted to us through completion of online forms, inserting information through the portal, and/or any other newsletters, product demos, etc.



The main purpose of collecting data is:

- Compliance with national and international legal and regulatory/supervisory provisions;
- Identifying the client and suitability of the client in relation to the products and services offered and provided by GIV;
- Improving the quality of services to natural/legal persons;
- Research and statistical analysis;
- Facilitation of technical administration;
- To take into consideration your online website behavior and trend;
- Improve the quality of services and develop new ones;
- Improve security by protecting against fraud and abuse;
- To provide you with the transaction and post transaction-related services;
- To inform you of products and/or services that may be of interest to you;
- Ensuring network and information security;

All personal data is stored in accordance with the applicable laws on data protection.

## THIRD PARTY SITES

This website may contain links to other websites. Please note that GIV Capital cannot be held responsible for the privacy policies of other websites. We encourage all visitors to be aware and read the privacy statements of every website that collects personally identifiable information. GIV Capital can confirm that it has a strict policy of not sharing your Personal Identifiable Information with an unauthorized third party under any circumstances.

## DISCLOSE DATA TO THIRD PARTY

Your personal data will be kept confidential and will be treated as such, it is to be noted that GIV will only disclose website usage data and/or personal data, to third parties as permitted by law(s), where and if GIV is legally obliged to do so or if such disclosure becomes necessary to enforce GIV's rights in particular to enforce claims arising from a contractual relationship, or required to comply with any judicial, and/or other proceedings, court order, legal process or pursuant to any governmental, intergovernmental and/or other regulatory bodies, whereby such disclosure may be executed by GIV without prior notice to you.

GIV Capital will not be liable for unlawful or unauthorized use of your personal information/passwords/username/login, etc due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise. GIV Capital may disclose your personal data to but not limited to business introducers, affiliates, any of the entities within the GIV Group of Companies, (who might process data on behalf of GIV and who may only use it for the same purposes as GIV), third party service providers in order to process obligations arising from the agreement, financial institutions, banks, other similar organizations that we deal with in course of corporate business, external service providers and professional advisers, which may be located overseas, such as auditors, lawyers and accountants, any third parties where this is necessary to process a transaction or provide services which you have requested or for trade reporting purposes.

## EU GENERAL DATA PROTECTION REGULATION (GDPR)

GIV Capital as a Data Processor is voluntarily committed to comply with the requirements and principles of GDPR in processing your personal identifiable information.

We will safeguard information in our custody. We have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorized disclosure, use or modification. Access to Personal Information is restricted to employees and authorized service providers who need it to perform their work.



## COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with the best experience when you browse our website and also allows us to collect statistical information to enhance site functionality and performance.

If you register with us or if you continue to use our website, you are agreeing to our use of cookies.

### What is a cookie?

A cookie is a small text file sent to your browser by a website you visit which is saved to your computer or mobile device. It enables the website to remember your actions and preferences (such as login, language and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

### Purposes and Types of Cookies

GIV Capital's website uses cookies for statistical purposes and in order to improve the quality of services to the user. Information is stored, such as the specific preferences when using the website. It is to be noted that you can configure your browser not to save any or only certain cookies on your device. There are different types of cookies such as ID cookies which do not expire when you close your browser, and persistent cookies which remain on your hard drive for a period of time.

- **Strictly necessary cookies:** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- **Session Cookies:** we use session cookies to allow you to carry information across pages of our site and avoid having to re-enter information. We use it within registration to allow you to access stored information. Non personal data for tagging purposes only (by random number).
- **Functionality Cookies:** we use persistent cookies to help us recognize you as a unique visitor when you return to our website and to allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly. To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website.

### Disable Cookies

If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your device notify you each time a cookie is sent to it, and thereby the choice to accept it or not.

It is strongly recommended that you allow cookies on our website to ensure you have best possible experience. Disabling the cookies may result in reduced performance of the website and trading platform, and may also impair the quality of the services that we provide you in relation to your account with us. You may not be able to use all the interactive features of our site if cookies are disabled. To find out how to enable/disable cookies see **[www.allaboutcookies.org](http://www.allaboutcookies.org)**.

## PRIVACY STATEMENT CHANGES

GIV Capital may change this privacy statement at any time. If a change does occur, you will be notified accordingly, and where applicable your consent would be required. You are advised to read the statements so that you are satisfied with the privacy conditions under which you provide GIV Capital with your personal information.