

## **PRIVACY POLICY**

### **1. Introduction**

1.1 The CEDRA MARKET INVEST LTD, is a Limited Liability Company incorporated in Saint Lucia, with registration number 2024-00347 and having its registered address at Ground floor, the Sotheby building Rodeny bay, Gros-Islet, Saint Lucia.

1.2 The Company mainly offers financial and commodity-based derivative instruments and other securities.

### **2. General**

2.1 The Company understands the importance of maintaining the confidentiality and privacy of its Client's information. By entrusting the Company with confidential information, we are committed to protecting and respecting your personal data.

2.2 The Company has developed specific policies and practices designed to protect your personal data. The Company shall not disclose to a third party, any of its Clients' confidential information unless required to do so by a regulatory authority of a competent jurisdiction.

2.3 The information may be disclosed to third parties, such as:

- a) Company Partners and Affiliated group companies,
- b) Service providers, payment service providers and banks processing your transactions,
- c) Introducing brokers and affiliates,
- d) Government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests,



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- e) Courts and tribunals,
- f) Auditors and other contractors

2.4 The Company will use your personal data for the purposes for which it collects them, unless the Company reasonably considers that it needs to use it for another reason and that such reason is compatible with the original purpose and the law (in which case your knowledge or consent for use thereof is not required).

### 3. Personal Information

3.1 The personal Data collected by the Company may include, but not limited to:

- a) Personal information the Clients provide on their applications and other form, such as name, address, date of birth, social security number and occupation;
- b) Financial information such as income, assets, financial investment experience;
- c) Documents provided by the Clients to enable the Company to verify the Clients' identity, such as passport, identity card, driver's license utility bill, bank statements or in certain situations the Clients' company's incorporation documents.

3.2 We obtain this information in a number of ways through your use of our services and websites, the account opening applications, our demo sign up forms, website cookies and similar tracking technology built into our Websites and Apps.

3.3 We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.



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#### 4. Contacting You

4.1 The Company may, for the purpose of administration, from time to time, contact the Client(s) by telephone, e-mail, fax or post.

4.2 If the Client(s) agree, we or any of our Affiliates of the Company may make contact from time to time, by telephone, e-mail, fax or post for marketing purposes to bring to the Client's attention products or services that may be of interest to the Client(s) to conduct market research.

#### 5. General Requirements for Data Processing

5.1. Data processing means collection, recording, arrangement, storage, alteration, disclosing,

consultation, extraction, use, transmission, cross-use transferring or granting access to third

parties, interconnecting, closure, deletion or destruction of data, or several of the

aforementioned operations, regardless of the manner in which they are performed or the means used.

5.2. The Company shall compile a list and documentation of means used in data processing and shall keep records of data processing. The list of means used in data processing shall include the name, type and number of the equipment and the name of the manufacturer of the equipment; the name and number of the license of the software used and the name of the software manufacturer; the location of the documentation of the software used.

5.3. Persons engaged in the processing of data shall process data only for authorised purposes under the established conditions and according to the instructions and orders received, and they shall maintain the confidentiality of data



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which has become known to them in the course of performance of their duties and which are not intended for public use. Such confidentiality requirement continues after termination of the employment or service

relationship with the Company.

5.4. Unauthorised processing of data (including recording, alteration, deletion, reading, copying, transmission), unauthorised transportation of records and any other unauthorised use of data (not prescribed by official duties) shall be prohibited.

5.5. The Company shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterwards enable identification of the person who performed the operation, the nature and time of the operation and any other relevant facts, including when, by whom and which data were recorded, altered or deleted, or when, by whom and which data in the data processing system were accessed, as well as information on any transmissions of data.

A possibility for restoring the content of data before modifications shall be available when any

modifications are made in data or documents.

5.6. Every user of database shall be issued personal means of authentication, enabling them to use the database. The access password for electronic databases shall be changed at least once a quarter.

The use of any means of automatic entry of passwords shall be prohibited. A user of the data

processing system shall not have access to data, which are not required for authorised data



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processing and the performance of duties of that particular user.

5.7. Adequate security measures, including encryption of data if necessary, shall be implemented upon transmission of data by means of data communication equipment or in the transport of records.

5.8. The manager or an employee of the Company shall rely on justified expectation that data

submitted by persons who submit data are correct.

The manager or an employee of the Company shall, from time to time, verify the accuracy of

data in the database(s) by requesting the data subject to check the data and, if necessary, make corrections or confirm the accuracy of data.

5.9. Any incomplete or incorrect data known to the manager or an employee of the Company

shall be closed, and any necessary measures shall be taken promptly to supplement and correct the data in question. Upon a request of a data subject, the manager or an employee of the Company shall correct any incorrect data on the data subject in the database if the data subject notifies the manager or employee of the Company of the inaccuracy of the data on the data subject and submits correct data; the incorrect data shall be stored with the correct data and with a note indicating in which period the incorrect data were used.

5.10. If the accuracy of data is in dispute, the data in question shall be closed until confirmation of accuracy of the data or determination of correct data.

Third persons who provided or received the data shall be promptly notified of any corrections



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made in data if it is technically feasible and does not lead to disproportionate expenses.

5.11. Automatic decisions of the data processing system, without participation of the data

subject, shall be permitted only on the conditions and pursuant to procedures specified by law.

## 6. Rights of the Data Subject

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

6.1 Request access to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you so as to check that we are lawfully processing such.

6.2 Request correction of your Personal Information. This enables you to have any incomplete or inaccurate information completed and or amended accordingly.

6.3 Request erasure of your personal data. This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

6.4 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object



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where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

6.5 Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please send an email to [Complaints@cm-invest.com](mailto:Complaints@cm-invest.com)

## 7. Cookies

7.1 We use cookies and other technologies to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any 3rd party. Cookies are readable only by us and do not contain any personal information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited.



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7.2 We may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner advertisements.

7.3 All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services but some functions may not work as designed.

## 8. Amendment/Review

The Company has the right to amend the current policy without being obliged to notify its Clients in advance. Thus, the Clients should refer to the Company's website for the latest and most up to date version of the Policy.



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