



INTRODUCER BROKER PRIVACY POLICY

SPECTRA GLOBAL LTD

AN INVESTMENT DEALER (FULL-SERVICE DEALER EXCLUDING UNDERWRITING) LICENCE AND
GLOBAL BUSINESS COMPANY LICENSED BY THE FSC



1. Introduction

This Privacy Policy outlines the principles governing the collection, processing, storage, and sharing of personal data by an Introducer Broker acting in connection with licensed Investment Dealers under the regulatory framework of the Financial Services Commission (FSC) in Mauritius. All personal data is handled in accordance with the Data Protection Act 2017 and applicable financial sector obligations.

2. Purpose

The purpose of this policy is to ensure transparency in the handling of personal data provided by individuals during the client introduction process. The policy explains the type of data collected, the reasons for its collection, the conditions under which it may be shared, and the rights available to individuals under applicable laws.

3. Scope

This policy applies to personal data processed in connection with the introduction of potential clients to Investment Dealers. It covers data collected from individuals, corporate representatives, beneficial owners, and users of communication or digital platforms operated or used by the Introducer Broker.

4. Legal and Regulatory Framework

All data processing activities are conducted in compliance with the Data Protection Act 2017 (Mauritius), and where applicable, international data protection standards such as the General Data Protection Regulation (GDPR). Processing activities are also aligned with financial compliance obligations, including KYC, AML/CFT, FATCA, and CRS requirements, in coordination with licensed Investment Dealers.

5. Categories of Personal Data Collected

Personal data collected may include full name, residential and email address, telephone number, date of birth, nationality, identification number (national ID or passport), and other contact details. Additional information may include investment preferences, source of funds, financial profile, tax identification numbers, and supporting KYC documents. Technical data such as IP addresses, browser types, and session logs may be collected through digital platforms.

6. Purpose of Data Collection and Use

Personal data is collected to facilitate the introduction of individuals to licensed Investment Dealers, assess suitability, support pre-onboarding requirements, and comply with applicable regulatory frameworks. Data may also be used to transmit preliminary client details, communicate follow-ups, and where authorised, share updates on related investment opportunities.

7. Lawful Basis for Processing

Processing of personal data is conducted on lawful grounds including the explicit consent of the individual, legal obligations under financial services laws, and legitimate interest in assessing client suitability and supporting regulated Investment Dealers in fulfilling compliance obligations. Consent is obtained prior to any data transfer to a third party and may be withdrawn at any time, subject to applicable legal requirements.

8. Data Sharing and Disclosure



Personal data is disclosed only to regulated Investment Dealers or their appointed agents for purposes directly related to client onboarding, regulatory checks, and service delivery. Data may also be shared with third-party service providers such as IT systems or digital platforms under contractual obligations ensuring data confidentiality and compliance. No personal data is sold or commercially distributed to external parties.

9. International Data Transfers

Where personal data is transferred outside Mauritius such as for storage on cloud-based platforms or to international partner firms, appropriate safeguards are applied in accordance with the Data Protection Act 2017. These include binding data protection agreements, standard contractual clauses, or reliance on jurisdictions with adequate data protection laws.

10. Data Retention

Personal data is retained only for as long as necessary to fulfil its intended purpose or to comply with applicable legal and regulatory requirements. If a referred individual does not proceed to become a client, personal data is retained only for a limited period before being deleted or anonymised. If a referral results in an established relationship, records may be retained for up to seven (7) years following the end of the business relationship or longer if required by law.

11. Data Security

Appropriate technical and organisational security measures are implemented to protect personal data from unauthorised access, loss, misuse, alteration, or disclosure. These measures include encryption, secure data storage, access controls, system monitoring, and staff confidentiality training. Data protection practices are reviewed and updated regularly to align with industry standards.

12. Data Subject Rights

Under the Data Protection Act 2017, individuals have the right to access personal data held about them, request correction of inaccurate or incomplete information, object to or restrict processing, request erasure in specific circumstances, and withdraw consent where applicable.

Changes to This Policy

This Privacy Policy may be updated from time to time to reflect legal, regulatory, or operational changes. The most recent version will always be made available on the official website or upon request. Material changes affecting personal data rights or processing purposes will be communicated appropriately in line with legal requirements.