



PRIVACY POLICY & INTERNAL POLICY

VERSION 1.0

SPECTRA GLOBAL LTD

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

TABLE OF CONTENTS

OVERVIEW.....	2
DATA PROTECTION FRAMEWORK	2
PRIVACY POLICY & INTERNAL PRIVACY CONTROLS	2
RETENTION OF RECORDS.....	5
COOKIES	6
THE PROTECTION OF NON-PUBLIC INFORMATION	6
YOUR CONSENT	7
CUSTOMER ACCESS TO NON-PUBLIC INFORMATION & CHANGES TO PRIVACY POLICY	7
QUERIES	7

OVERVIEW

Spectra Global Ltd (the "Spectra Global" or "The Company") places a high priority on the privacy and integrity of the personal information of our customers, both present and future. The Company strives to ensure the safety and confidentiality of all information received from the Customer. This Privacy Policy & Internal Privacy Controls (the "Policy") describes how the Company collects, uses, and protects the personal information of the Customer.

Where any entity within the Company acts as a controller, the controller will be deemed to be the Spectra Global entity listed on the terms and conditions that you enter into when using a Spectra Global service.

DATA PROTECTION FRAMEWORK

In accordance with the Mauritius Data Protection Act 2017, the Company views the protection, privacy, and the safeguarding of that personal and financial information of clients and website visitors as a high priority.

Spectra Global ("the Company") and everyone responsible for using data follow strict rules on how personal information can be collected and used. Users must make sure the information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant, and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred without adequate protection

PRIVACY POLICY & INTERNAL PRIVACY CONTROLS

The Company routinely collects personal, confidential, and sensitive non-public information ("Non-Public Information") from its customers. The Company is committed to safeguarding this information so that its confidentiality can be maintained and unauthorized access, use or disclosure of this information can be prevented. If the Customer does not want the Company to use the Non-Public Information, the Customer should so inform the Company in writing by sending an email or a letter by registered post at the registered office of the Company. Should the Customer wish to opt out, the Company may not be able to continue providing information, services and products requested by the Customer and the Company shall have no liability to the Customer in respect of the same.

The Company will not use or disclose Non-Public Information for any purpose other than for the performance of business activities or if required by law.

This Policy describes how Spectra Global protects and handles the Non-Public Information it collects on customers who apply for or receive its products and services. The provisions of this policy apply to current, former, and prospective customers of the Company.

The kind of personal information we collect and use about you:

Personal information or personal data means any information about a living individual from which that person can be identified, even without any linkage to their name. It does not include data where the identity of the individual has been completely and permanently removed (which is called anonymous or anonymised data). The types of personal information we collect include the following categories:

- a) Identity and Profile;
- b) Contact;
- c) Financial;
- d) Usage;
- e) Transaction;
- f) Marketing and Communications; and
- g) Technical.

How is your personal information collected?

The Company collect information from the Client where the Client will fill in forms on the Company's website or by corresponding with us by phone, email or otherwise. It includes information the Client provide when the Client register to use the Company's website, when the Client report a problem with Company's site or when the Client contact the Company to discuss any aspect of the Client's account with the Company. When the Client visit our website, access the Company's services, engage with Company's emails and online ads, the Company may collect information by automated means.

- a) We obtain most of the customer personal information shared with us directly through account applications or other submission forms, and from maintaining records of customer information provided in the course of our ongoing customer service. We may also obtain information from other sources to meet certain regulatory requirements.

b) On occasion, we will ask for other information voluntarily (for example, through market research, surveys or special financial promotion offers) to enable us to improve our service or consider the wider needs of our customers.

Information we receive from other sources

c) On occasion, we will collect Client's personal information indirectly and through a third party. Examples of this include our use of credit reference agencies to perform KYC (client verification) and AML (anti-money laundering) checks.

Disclosures of personal information

We share your personal information with our trusted third parties as part of the operation of our global business. Your personal data will be shared with the following categories of recipients:

- a) other companies within the Spectra Global of companies who provide financial and other services;
- b) service providers and specialist advisers who have been contracted to provide the Company with administrative, financial, insurance or other similar or related services;
- c) introducing brokers with whom, we have a mutual relationships;
- d) credit providers;
- e) courts, tribunals and regulatory and government tax authorities as agreed and authorised by law;
- f) reference and credit reference agencies. This includes exchanging information with other companies and organisations for the purposes of money laundering regulations, financial crime, fraud protection and mitigation of credit risk;
- g) anyone authorised by you to act on your behalf, as specified by you or by law through Power of Attorney;
- h) advertisers and advertising networks that require data to select and serve relevant adverts to the Client and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;

- i) analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- j) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with Client.

International transfers

Spectra Global is an international business that has operations and service providers around the world. Where we transfer the Client's personal information outside of the jurisdiction in which the relevant controller (pursuant to this privacy notice) is incorporated in ("Jurisdiction"), as well as to processors located outside of the Jurisdiction who are engaged on the Company's behalf. Where we transfer the Client's information outside of the Jurisdiction, we will ensure that the transfer is lawful and that there are appropriate security and contractual arrangements in place to safeguard such transfers. If we transfer the Client's personal data to another country that doesn't offer a standard of data protection equivalent to the Jurisdiction from which the Client's personal data is transferred from, we will ensure that the Client's personal data is sufficiently protected through mechanisms such as (where applicable), (i) approved Standard Contractual Clauses; (ii) Binding Corporate Rules; (iii) standard data protection clauses, certification or an approved code of conduct adopted by a supervisory authority within the Jurisdiction; or (iv) a contractual framework deemed to provide an adequate level of protection for personal data.

Changes to our privacy notices

Any changes we make to our privacy policy in the future will be posted on the Company's website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

RETENTION OF RECORDS

Spectra Global will keep personal data only as long as it is necessary, including for the purposes of updating the product or services or as required by law. When the personal data is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorised parties from gaining access to the information during and after the process.

We will safeguard information in our custody.

We have developed and will maintain security procedures to safeguard personal data against loss, theft, copying and unauthorised disclosure, use or modification. Access to personal data is restricted to employees and authorised service providers who need it to perform their work.

COOKIES

What are cookies? Cookies are small pieces of information sent by a web server to store on a web browser so it can be read back later from that web browser. Cookies may be used on some pages of the Site for us to provide Site users with a more customized web browsing experience.

THE PROTECTION OF NON-PUBLIC INFORMATION

The Company takes the issue of security very seriously and ensures that all possible measures to ensure the safety of your confidential information, including adhering to strict standards for the internal use of confidential information and using leading data storage technology.

When making a payment with a credit/debit card, the client will be transferred to the site of the processing center where a form has to be filled. To prevent the unauthorized use of your credit/debit card, the card information of the client is transmitted to the Company in shortened form and through a secure server. In certain exceptional circumstances, The Company may refund payments made by credit or debit card. In this case, the funds will be refunded to the card that was used for the deposit.

The Company may occasionally share Non-Public Information with its affiliates or third-party service providers and joint marketers not affiliated with The Company. This information may be shared for a variety of purposes, such as to support the financial products and services provided to customers, to service customer accounts, to cooperate with regulatory authorities and law enforcement agencies, to comply with court orders or other official requests, or, as necessary, to protect the Company's rights or property.

By accepting the Customer Agreement, the Customer consents to the Company collecting, maintaining, using, and disclosing their Non-Public Information in accordance with the terms of this Policy.

The Company has established procedures designed to prevent the use of insider information by an effective segregation of its activities, including to other members of the Group.

No investment decisions concerning the portfolio of clients shall not be communicated or be (made) available to any unauthorised third party, without the consent of the clients.

YOUR CONSENT

By accessing our Site, you consent to Spectra Global collecting, maintaining, using, and disclosing your Personal Data in accordance with this privacy policy.

CUSTOMER ACCESS TO NON-PUBLIC INFORMATION & CHANGES TO PRIVACY POLICY

The Company endeavours to keep its customer files complete and accurate it shall also give its customers reasonable access any Non-Public Information maintained on that customer.

This Policy is set out on the Website and The Company may update this Policy from time to time. The revised Policy together with a general notice informing customers of such change will be promptly posted to the Website as and when this Policy is materially amended. The Customer irrevocably agrees the posting of a revised Policy electronically on the Website as constituting actual notice to the Customer. Any dispute over the Policy is subject to this notice. The Customer is encouraged to periodically check back and review this Policy so that the Customer will always know what information the Company collects, how it uses it, and to whom it discloses it.

QUERIES

If you have privacy questions which are not answered by this Privacy Policy or any other concerns about how we use your personal data, please write to us at:

In writing	Spectra Global Ltd C/o Credentia International Management Ltd, The Cyberati Lounge, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebene, Republic of Mauritius
Via email to:	support@sgfx.com