



## PRIVACY POLICY & INTERNAL POLICY

SPECTRA GLOBAL LTD

## **1. Privacy Overview**

At Spectra Global Ltd (“Spectra Global” or “the Company”), we are committed to maintaining the privacy, security, and integrity of personal information entrusted to us by our existing and prospective clients. We place great emphasis on ensuring that all personal data shared with us is treated with strict confidentiality and safeguarded from unauthorized access

This Privacy Policy & Internal Privacy Controls (referred to as “the Policy”) outlines the ways in which Spectra Global collects, processes, uses, and protects personal data. When any Spectra Global entity is identified as a data controller, it refers to the entity specified in the terms and conditions governing the use of the relevant Spectra Global service.

## **2. Data Protection Commitment**

All Company personnel who handle personal data are required to follow clear principles regarding data usage. This ensures that data is:

- Collected and used lawfully, fairly, and transparently
- Processed only for clearly defined, legitimate purposes
- Relevant and limited to what is necessary for those purposes
- Accurate and kept up to date
- Retained only for as long as necessary
- Processed in line with individuals’ data protection rights
- Stored securely and protected from unauthorized access or breaches
- Transferred only with sufficient safeguards in place

## **3. Privacy Controls and Handling of Personal Information**

As part of its business operations, Spectra Global may collect and retain certain personal, confidential, and sensitive non-public information (hereafter referred to as "Non-Public Information") from its clients. The Company is committed to implementing robust internal controls to preserve the confidentiality and integrity of this data.

If a client does not wish their Non-Public Information to be processed, they may notify the Company in writing by email or by registered mail sent to the Company’s registered address.

Please note:

Should a client choose to opt out of data usage, Spectra Global may be unable to provide some or all services, products, or communications requested by the client. In such cases, the Company shall bear no responsibility or liability for the unavailability of those services.

## **4. Use and Protection of Non-Public Information**

Spectra Global Ltd (“the Company”) is committed to ensuring that any Non-Public Information (NPI) obtained from clients is used strictly for the purpose of conducting legitimate business activities, or

when disclosure is required by applicable law or regulation. The Company will not use or share such information for any other purpose.

This Privacy Policy outlines how Spectra Global safeguards and manages confidential personal information collected from individuals who apply for, use, or inquire about the Company's products and services. These privacy standards apply equally to current, former, and potential customers.

## **5. What Types of Personal Data We Collect**

"Personal data" refers to any information that relates to a living person and could be used to identify them—even if their name is not included. This does not include data that has been fully anonymized and cannot be traced back to an individual.

The categories of personal data that Spectra Global may collect include:

- a) Identity and Profile Information – such as full name, ID/passport number, nationality, or date of birth
- b) Contact Information – including phone numbers, email addresses, and physical addresses
- c) Financial Data – such as income, assets, bank details, or credit history
- d) Usage Information – including how you use our website, apps, and services
- e) Transaction Data – involving your trading activity, account funding, withdrawals, and transaction history
- f) Marketing and Communications Preferences – such as your responses to campaigns or communication choices
- g) Technical Data – including IP address, login details, browser type, and interaction with online content

## **6. How We Collect Your Personal Information**

Spectra Global collects personal information through both direct interactions and automated technologies:

- You may provide data by filling out forms on our website, registering an account, subscribing to services, or contacting us via email, telephone, or other correspondence.
- We may collect data when you report a technical issue, request information, or engage with our support teams.
- When you interact with our website, emails, advertisements, or platforms, we may gather technical and usage data through automated tools such as cookies or analytics software.

Additionally:

- Most personal data is collected directly through account applications, onboarding documents, and ongoing customer interactions.
- We may also gather information from third-party sources, including regulatory databases or verification services, where required for compliance with legal or regulatory obligations (e.g., anti-money laundering checks or KYC requirements).
- From time to time, we may invite you to voluntarily provide additional information—for example, through customer surveys, market research initiatives, or promotional campaigns.

This helps us better understand your preferences, improve our service offerings, and assess the broader needs of our client base.

- We may also collect your personal data indirectly through third parties. This typically occurs when we work with external partners such as credit reference agencies to conduct Know Your Customer (KYC) verification and fulfill Anti-Money Laundering (AML) obligations.

## **7. Sharing of Personal Information**

In the normal course of operating our international financial services business, we may share your personal data with reliable third parties. These disclosures are limited to entities that support our service delivery, compliance, or marketing goals. The categories of recipients include:

- a) Affiliated companies within the Spectra Global corporate group that offer financial or support services.
- b) Professional service providers, including administrative, legal, compliance, insurance, technology, or financial specialists contracted by the Company.
- c) Introducing brokers or partners with whom we maintain formal business relationships.
- d) Credit providers or financial institutions involved in facilitating transactions or credit assessments.
- e) Courts, regulators, taxation bodies, and government authorities, where required or permitted by applicable law.
- f) Credit reporting and reference agencies, as well as other financial institutions and compliance bodies, in connection with fraud prevention, anti-money laundering, financial crime monitoring, and credit risk management.
- g) Authorized representatives, such as individuals acting on your behalf under Power of Attorney or other legal authorization.
- h) Advertising and marketing networks, who may receive non-personally identifiable, aggregated data for the purpose of displaying relevant, targeted advertisements.
  - We do not share identifiable personal information with advertisers.
  - However, we may use anonymized or aggregated user insights to assist advertisers in reaching appropriate target audiences.
  - We may also use this data to display ads that align with your interests, based on our understanding of your profile.
  - i) Analytics and search engine partners that help us enhance the performance, functionality, and optimization of our website.
  - j) Credit reference agencies, where necessary, to evaluate your creditworthiness—particularly when such an assessment is a prerequisite to entering into a contractual relationship with you.

## **8. International Data Transfers**

As a global financial services provider, Spectra Global operates across multiple jurisdictions and engages with international service providers. This means that, at times, your personal information may

be transferred outside of the jurisdiction in which the applicable data controller is incorporated (referred to as the “Jurisdiction”).

Such transfers may also include the sharing of data with third-party processors located abroad who act on the Company’s behalf. In every case, Spectra Global ensures that all international data transfers are conducted lawfully, with robust contractual and security safeguards in place to protect your information.

Where data is transferred to a country that does not offer a level of data protection equivalent to your Jurisdiction, Spectra Global will implement appropriate safeguards, which may include:

- Standard Contractual Clauses (SCCs) approved by relevant regulatory bodies
- Binding Corporate Rules (BCRs) for intra-group transfers
- Regulatory-approved certifications, codes of conduct, or contractual mechanisms
- Any other legal arrangements deemed to offer adequate protection for the transferred personal data

## **9. Updates to the Privacy Policy**

From time to time, we may revise this privacy policy to reflect regulatory changes, improvements to our services, or updates in data handling practices.

Any amendments to the privacy policy will be published on the Company’s official website, and where appropriate, we will notify you via email.

We encourage you to regularly review this section to stay informed of how we protect your personal data.

## **10. Data Retention Policy**

Spectra Global retains personal information only for as long as necessary to fulfill the purpose for which it was collected, including to meet legal, regulatory, or operational obligations. Once personal data is no longer required, it will be securely disposed of using approved destruction methods, such as shredding or digital data wiping, to prevent unauthorized access or misuse.

Throughout the data lifecycle, the Company is committed to protecting all customer information held in its custody, maintaining strict controls to ensure its confidentiality and security.

## **11. Data Security Measures**

Spectra Global has implemented, and will continue to uphold, robust security protocols designed to protect personal data from loss, theft, duplication, unauthorized access, use, or alteration. Access to such data is strictly limited to employees and authorized third-party service providers who require it to perform specific duties on behalf of the Company.

## **12. Cookies Policy**

What Are Cookies?

Cookies are small data files sent from a website’s server and stored on a user’s browser, enabling the server to recognize the browser upon future visits.



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Some pages on our platform may utilize cookies to enhance the user experience, allowing for personalized browsing and improved functionality of the site.

### **13. Safeguarding Non-Public Information**

Spectra Global takes the security of Non-Public Information (NPI) seriously and adheres to stringent internal policies and modern data storage technologies to maintain the confidentiality of all sensitive client data.

When clients initiate transactions via credit or debit card, they are redirected to a secure payment processing gateway where a form must be completed. To ensure security:

- Card information is transmitted using encrypted channels.
- Only shortened or tokenized card data is stored or transmitted to the Company.

In rare circumstances where a refund is necessary, it will be issued to the same card originally used for the transaction.

### **14. Sharing of Non-Public Information**

From time to time, the Company may share NPI with:

- Affiliates,
- Third-party service providers, or
- Joint marketing partners,

to support the delivery of financial services, manage customer accounts, or comply with legal and regulatory obligations.

Data may also be shared with:

- Regulatory authorities or law enforcement,
- In response to court orders, or
- To safeguard the Company's rights or assets, when necessary.

### **15. Client Consent and Use of Information**

By accepting the Customer Agreement, clients consent to the collection, use, retention, and disclosure of their Non-Public Information in accordance with this Privacy Policy.

### **16. Insider Information and Segregation of Duties**

The Company maintains strict internal controls to prevent misuse of insider information. This includes effective segregation of functions and restricted information sharing across departments and affiliated group entities.

No information related to client portfolios or investment decisions will be shared with or disclosed to any unauthorized party without the explicit consent of the client.

#### **17. Your Consent**

By using or accessing the Company's website, you voluntarily agree to Spectra Global's collection, storage, use, and disclosure of your personal data as outlined in this Privacy Policy.

#### **18. Client Access to Personal Information & Policy Amendments**

Spectra Global is committed to maintaining accurate and complete client records. The Company will provide clients with reasonable access to their Non-Public Information (NPI) held in its systems, upon request.

This Privacy Policy is published on the Company's official website and may be updated periodically. Whenever a material change is made, the revised version of the Policy will be posted online, along with a general notice informing clients of the update.

By continuing to use the Company's services, the client irrevocably agrees that the electronic publication of the updated Privacy Policy on the website constitutes sufficient and valid notice of the changes.

Clients are encouraged to review this Policy regularly to stay informed about:

- What data the Company collects
- How it is used
- With whom it may be shared

Any disputes relating to this Privacy Policy will be governed by the most current version posted on the website.

#### **19. 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:

<b>Via email to:</b>	support@sgfx.com
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