



Privacy Policy



BABA INVESTMENT (SVG) LLC

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1. GENERAL INFORMATION

- 1.1. The collection and use of personal information constitute an integral part of the Company's daily business activity, whereby the Company intends to provide the best services and products to its Clients, including potential ones.
- 1.2. The present Privacy Policy ("Policy") is an integral part of the public documents' set, which is aimed to establish and regulate the approach of the Company in relation to the application of aggregated Client's personal information while providing services to them. The Policy is revised periodically to ensure that all newly appeared legislative changes, technological solutions, changes related to business practice are comprehensively incorporated in a proper way and maintain the most up-to-date character.
- 1.3. Since the Policy has been adopted as a part of the Company's set of documents, the acceptance of this Policy is indispensable for the provision of the Company's services. If the potential or actual Client refuses to give a consent to the terms of present Policy, it shall immediately lead to the cease of all services and termination of other contractual arrangements between Client and the Company.
- 1.4. This Policy applies a range of privacy-related terms, among others the listed definitions are:
 - a. "Consent" shall mean intentional, unambiguous and freely given permission of the Client to process the data relating to him or her;
 - b. "Encryption" shall mean the method whereby the data (irrespective of its form and format) is converted to an encoded version which can be subsequently decoded by the persons having an access and decryption key;
 - c. "Processing" shall mean an action or a set of actions, performed on personal data or personal information whether or not by automated means;
 - d. "Third party" shall mean any legal or natural person, public authority, body or agency which are authorized to request an access to or process personal data under the authority of the Company or in cases prescribed by law;
 - e. "Personal Data or Personal Information" shall mean any information related to an identified or identifiable Client of the Company;
 - f. "Secure Sockets Layer ("SSL")" shall mean a cryptographically secured protocol, used for the secured connection and transmission of data;
 - g. "PCI Data Security Standard ("PCI")" shall mean a self-regulatory system that provides an enforceable security standard for payment card data which also covers a compulsory application of the security assessments and violations' detection.

2. PERSONAL INFORMATION: TYPES AND METHODS OF COLLECTION

- 2.1. The personal information of the Client is collected in two possible ways, namely manual and via the automated means. The data, collected manually means that the Client takes all reasonable steps in the provision of the particular information or a document.
- 2.2. The Policy sets the following types of personal data to be acquired from a Client prior to and in the

course of business relations between Client and the Company:

- a. Full name as provided in passport or other ID, date of birth and residence address;
- b. Contact details such as email address, telephone number, fax or any other;
- c. Information regarding the Client's income, including source of funds, financial assets and liabilities, bank account information;
- d. Trading performance, knowledge and experience;
- e. Identity verification documents such as Passport, ID Card or Driving License;
- f. Residence verification documents such as utility bill, residence certificate or other; and
- g. Payment documents: money transfer order, bank statement, bank card copies, etc.
- h. Preferences on which of the Company's services and products the Client is interested in.

2.3. The Policy sets the following information that is acquired via the automated means:

- a. IP-address;
- b. Network system;
- c. Type of operational system; and
- d. Types and settings of browser;

2.4. By the general rule, the information, collected via automated means, should not be considered as able to identify Client neither directly or indirectly. The list of information, requested from the Client, should not be considered as exhaustive. The Company preserves the right to request additional data especially in those cases, when it is necessary to ensure compliance with the regulations of existing legislation.

3. COOKIES

3.1. Cookies are small files stored on a computer or other device and used by the web server for keeping track of the end user's browser activities, including delivering individually tailored requests into a session. This means that cookies are used for the assessment of advertisements and promotions as well as evaluate Clients' interests in services and products, provided by the Company.

3.2. The cookies foresee the possibility of choice whether to accept all, restrict to limited range or withdraw from them. However, the Client should note that partial or full restriction of cookies would lead to impossibility to access or use certain parts of the Company's website or its features. Cookies are not used to determine the personal identity of anyone visiting the site.

4. TYPES OF DATA ACQUIRED FROM USERS' DEVICES

4.1. Web Bugs (or web beacon, pixel tag, clear GIF) which constitute a little graphic image that is usually delivered via web-browser or an email and used for the tracking of emails' delivery, webpage viewing and

other statistical information.

- 4.2. Device information which is obtained at the moment of Client's access to the website. The recognition of Client's device is important for the delivery of the most appropriate version of the website.
- 4.3. Log information which is necessary for the tracking of website user's activity and ensure the diminishing any potential inconsistencies.
- 4.4. Location information, through the identification of the IP address in order to be able to localize the content for a particular country that the Client sees on the Company's website.

5. BASIS AND PURPOSES OF PERSONAL DATA PROCESSING

- 5.1. The Company may use a Client's Personal Data for one or more of the following purposes:
 - a. **Statutory compliance.** In order to be able to provide its services, the Company is subject to the compliance with a range of legislative provisions establishing the regulation on the prevention of the money laundering and terrorism financing, financial services' provision, taxation, corporate and other branches of law etc.
 - b. **Performance of contractual obligations for the provision of services.** The Company processes personal data to accomplish on-boarding, Know Your Customer and Customer Due Diligence procedures and provide its services and products
 - c. **Formation of a profile and assessment of the appropriateness.** The Company needs to process the personal information about the Client at the moment of the account opening for him or her. Subsequently and on a periodical basis, the company must perform an assessment on the provision of only appropriate services to the Clients.
 - d. **Marketing Purposes.** The personal data processed by the Company may be useful in view of sending marketing communications to the Client to ensure that the latter is informed about the latest news, changes, and improvements related to the services of the Company. The Client preserves the right to withdraw from marketing communications, however this does not cover cases when the Company intends to deliver information of legal nature.
 - e. **Improvements into the Company's services and products, including Client services.** The company may use information acquired from the Client by his activity and use of services to monitor the quality of the latter as well as introduce changes and improvements when necessary.
 - f. **Development and marketing of newly introduced services and products.** The information stated in the preceding paragraph may also be applied for the creation and promotion of new services.
 - g. **Legitimate concerns.** The Company has to protect and ensure efficiency of its legitimate interests related to various aspects. The latter may cover the use of personal information. The example of personal information' involvement includes such examples as exercise of internal business management, risk management, records keeping, adoption of security measures, operation of internal Company's IT system, marketing purposes, communication with Clients, in particular, on legal matters. At the same time, the Company undertakes an obligation that the use of personal information for own legitimate interests would not violate security of the mentioned data in any conceivable way.

6. STORING OF PERSONAL DATA AND RETENTION PERIOD

- 6.1 The Company undertakes all reasonable efforts in ensuring comprehensive security of personal data against external vulnerabilities. Security Sockets Layer encryption technology is used to introduce the enhanced protection of the information.
- 6.2 Application of the PCI Scanning measures as well as Transport Layer encryption and AES algorithm in Application layer with a key length 256 bit are intended to diminish risks associated with external overriding threats in relation to data, stored on credit cards.
- 6.3 Complex authentication systems and access control mechanisms are applied for the avoidance of unauthorized access to systems and data, which are kept on different internal systems as well as in secured servers.
- 6.4 In cases when a business relationship is terminated, the Company may have some obligations to retain personal information for a certain period of time. Such retention can be prescribed by law and incur data storing in different amounts and for different time period.

7. DISCLOSURE AND SHARING PERSONAL INFORMATION WITH THIRD PARTIES

- 7.1 The Company shall not disclose Clients' personal data to any third party. The following cases shall exclude the Company from any liability for disclosure and sharing of personal information to third parties:
- 7.2 In accordance with applicable laws, regulations, prescriptions or other instruments of binding nature, the Company may disclose the personal information to the required extent on its own or by legitimate request of state authorities, law enforcement bodies, judicial orders, regulatory authorities; or
- 7.3 The disclosure to third parties, which perform the execution of certain functions of the Company, act under the authorization of the Company, comply with the Company's compliance procedures and maintain the efficient level of personal information's security.

8. SECURITY AND PROTECTION

- 8.1. The Company takes the issue of security very seriously and takes all measure to ensure the safety of the client's 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 he/she will fill out a form. To prevent the unauthorized use of credit/debit card, the client's card information is transmitted to the Company in shortened form and through a secure server.

9. CHANGES IN THIS POLICY

- 9.1. This Policy is subject to a timely revising to consider new laws and technologies, changes to the Company's operations and practices as well as to ensure that the Policy corresponds to the changing environment. The Clients will be notified about the mentioned revisions through the available communication means.

10. LEGAL DISCLAIMER

- 10.1. The Company reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's site(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious.
- 10.2. Further information on Company's Privacy please direct your questions to the Company's Compliance Department: compliance@babaglobal.com.

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