

Privacy Policy

1. Introduction

- 1.1. **6i Group Ltd** (hereafter "6iTrade" or the "Company") is an Investment Firm incorporated and registered under the laws of the Republic of Vanuatu with registration number 40374. The Company is authorised and regulated by the Vanuatu Financial Services Commission ("VFSC").
- 1.2. The Privacy Policy (hereafter the 'Policy') sets out the procedures and methods used by the Company to collect, use and manage personal information from its visitors, potential and active Clients through the Company's Website. The Company understands the importance of maintaining the confidentiality and Privacy of its Client's information. By entrusting the Company with confidential information, we would like to assure our Clients that the Company committed to keeping such information private. The Company has taken measurable steps to protect the confidentiality, security and integrity of the Clients' information.
- 1.3. Clients should read and understand this Policy and all other 'Legal Documents' provided to the Clients on the Company's Website. It remains the Client's responsibility to seek advice from an independent and/or authorized advisor if necessary.
- 1.4. This Policy forms part of the Client's Agreement, namely, the 'Terms and Conditions' with the Company, thus the Client is also bound by the terms of the Policy, as set out herein.

2. Personal Data Collection and Usage

- 2.1. The Company will collect the necessary personal information in order to perform its services and activities. It is the Company's obligation to create a Client's profile in order to provide its services efficiently based on the Client's requirements and preferences. Hence, the Company will collect and hold Clients' personal data when a Client completes an online 'Registration' for opening a Client Account or when participating in any other promotion that the Company offers through its Website.
- 2.2. In accordance with the Company's regulatory requirements, the Client's personal data will be kept on record for a minimum period of 5 years after the business relationship ends between the Company and the Client.
- 2.3. The collection of personal data by the Company includes, but is not limited to:
 - a) personal information such as name, address, date of birth, contact number and email address;
 - b) financial information such as estimated annual income, net worth, investment trading experience and investment knowledge;
 - c) identity documents to enable the Company to verify a Clients Identity, such as passport, ID cards, utility bill, bank statement, and incorporation documents and related corporate documents for legal entities.
- 2.4. The personal data that the Company obtains may be used for any one or more of the following reasons:
 - a) verification of the identity of the Client;
 - b) create and maintain Client personal file;
 - c) transmit and execute Client Orders;
 - d) assess Client suitability to the products and services provided by the Company;
 - e) provide the Client post Transaction related services;

- f) inform the Client of the Company's products and services;
- g) assess and improve Clients' browsing experience;
- h) transmit Client's personal data to third parties for marketing purposes without prior written consent of the Client.

3. Disclosure

- 3.1.** The Company shall not disclose to any third party, any of its Client's personal data and/or information unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure will be on a 'Need-to-Know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances the Company shall inform the third party the confidential nature of the information.
- 3.2.** The Company may also disclose personal data to:
- a) financial institutions and any other similar organizations that are nominated by the Client;
 - b) external service providers and professional advisors that provide services to the Company;
 - c) any organization at the Clients request or any person acting on behalf of the Client;
 - d) any third parties where this is necessary to process a Transaction or provide services which the Client has requested, and/or, any authority to whom the Company is required to disclose such information by law.

4. Client Rights and Consent

- 4.1.** The Client is not obliged to provide the personal information that the Company requests, however, the Company may not be able to proceed to the opening of the Client's Account or provide the Client with any other services and/or information that the Client may demand.
- 4.2.** The Client has the right to request any personal data that the Company holds concerning themselves, which are collected in databases, unless this right is restricted by law. Decisions on granting or withholding authorisations for access to data and issuing copies of data shall be made by the Company. The Company may charge an administrative fee.
- 4.3.** The Client hereby gives its consent to such collection, processing, storage, disclosure and use of personal data by the Company.

5. Security

- 5.1.** The Company will not sell, lease or otherwise disclose Client's personal information to any third party and will implement strong measures to protect the security of its Client's personal data and to ensure it is not accessed by any unauthorized persons. The Client should not disclose their personal login details to any third party. In addition, the Company adopts strong security measures to protect the Client's personal data from loss, theft, copying, unauthorized access or disclosure, alteration or destruction. Such security measures include encryption, strong authentication mechanisms and separation of machines and data to implement secure areas.

6. Cookies

6.1. The Company uses Cookies in order to obtain information about its Client's access to the Company's Website and other services provided to its Clients. For further information all Clients should refer to the Company's 'Cookie Policy'. A Client who does not wish to receive Cookies should change the settings of His browser to refuse all Cookies or to be notified anytime Cookies appear and have the choice to accept or not. Nevertheless, it is strongly recommended to allow Cookies on the Company's Website as by turning off Cookies may lead to reduced performance of the Company's Website and Trading Platform and may also impair the quality of the services in relation to Client's Trading Account.

7. Tracking Systems

7.1. Tracking Systems used on the Company's Website(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits, etc. This information is obtained in order to improve the content of the Company's Website and may also be used to contact the Clients, through any appropriate means and providing the Clients with any information the Company believes to be useful to them.

8. Legal Disclaimer

8.1. The Company reserves the right to disclose the Client's personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect their 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 Website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious.

9. Updates and Amendments

9.1. The Company may update and amend this Privacy Policy from time to time, when it considers is suitable and appropriate. The Client will not be notified of any amendments to this Policy and it is the Client's responsibility to visit the Company's Website and review the Policy as well as the other 'Legal Documents' made available to the Client on a regular basis. After such changes are published on the Company's Website the client consents to such changes.