

PRIVACY POLICY

This Privacy Policy describes the manner in which AlphaPoint Global S.A. de C.V., as data controller, collects, uses, maintains and discloses information collected from users of our Electronic Trading Platform, including our website located at <https://apglobal.io> (the “**Website**”).

In this Privacy Policy, we use the term "**Client**" or "**you**" to refer to any user of the Electronic Trading Platform. This term includes clients who are individuals, as well as any individuals authorized to access the Electronic Trading Platform on behalf of individual or corporate clients, such as employees and contractors. The term also refers to individuals connected to our corporate clients whose personal information we may collect and process in order to provide our services, for example company directors and shareholders.

1. The personal information we collect

In this Privacy Policy, "personal information" means any information that can be used to identify you or that we can link to you.

We may collect personal information from Clients in a variety of ways, including, but not limited to, when Clients visit our Website, register on the Website, submit enquiries, complaints or requests to us, and in connection with other activities, services, features or resources we make available on our Website.

Clients may be asked for identification information as appropriate. We will collect personal identification information from Clients only to the extent required by our AML/KYC policy. Clients are not obliged to provide us with identification information, but if they do not provide it, they may not be able to use the Electric Trading Platform or other services offered by us.

The personal information we may collect from you include:

- your name and title;
- address and email address;
- log-in details;
- nature of the product or service requested;
- payment information; and
- related information so that we may provide the Electronic Trading Platform and other services to you.

When we conduct AML/KYC checks, we also collect personal information from third party sources, such as public registers and records and credit reference agencies.

2. Information collected automatically about Clients

We may collect certain information about Clients automatically whenever they interact with our Website. Such information may include the Client's IP address, browser name, the type of computer and technical information about Clients means of connection to our Website, such as the operating system and the Internet service providers utilized and other similar information. This information may be linked to other information about you, and may therefore constitute personal information.

3. Web browser cookies

Our Website may use "cookies" to enhance user experience. This means a Client's web browser places

cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Clients may choose to set their web browser to refuse cookies, or to alert them when cookies are being sent. If they do so, note that some parts of the Website may not function properly.

4. How we use collected information

AlphaPoint Global Ltd. may collect and use your personal information for the following purposes:

- To create an account for you and to provide our services to you;
- To run and operate our Electronic Trading Platform;
- To satisfy our regulatory requirements, including but not limited to, AML/KYC compliance;
- To respond to any questions, requests or complaints from you;
- To improve customer service;
- To personalise user experience by enabling the Electronic Trading Platform to 'remember' certain details about you and tailor the Website content and functionality accordingly; and
- To send periodic emails relating to the Electronic Trading Platform or other services.

We may use your email address to send you information and updates pertaining to any orders.

5. Legal bases for using your personal information

There are different legal bases that we rely on to use your personal information, namely:

- **Performance of a contract** – The use of your personal information may be necessary to perform the contract that you have with us. For example, as a user of our services we will use your personal information to respond to your requests and provide you with such services.
- **Consent** – We will rely on your consent when this is required by law, for example in relation to certain direct marketing practices. You may withdraw your consent at any time by contacting us at the details at the end of this Privacy Policy.
- **Legitimate interests** – We may use your personal information for our legitimate interests, for example to improve our products and services and the content of the Website. When we process personal information to meet our legitimate interests, we always balance these against the fundamental rights and freedoms of data subjects, and put in place robust safeguards to ensure your privacy is protected.
- **Compliance with laws** – We may use or disclose your personal information when we are required to do so by law (for example regulatory KYC and reporting obligations).

6. Your rights over personal information

You have certain rights regarding your personal information, subject to local law. These include the rights to:

- access your personal information;
- rectify the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;

- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability); and
- lodge a complaint with your local data protection authority.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

Please note that we will likely require additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us using the contact details below.

7. Information sharing

We do not sell, trade, or rent your personal identification information to others. We may share generic aggregated information not linked to any personal identification information regarding visitors and users with our business partners and with regulatory bodies to the extent required by law.

We may also share your personal information with third parties under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies to process secure payments, fulfil orders, optimize our services, send newsletters and marketing emails, support email and messaging services and analyse information.
- We may share certain information about your interactions with our systems with our Affiliates and Designees as needed in connection with the Transactions and the services provided to you (*e.g.*, internal reporting; marketing; regulatory requirement).
- Any law enforcement agency, court, regulator, government authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Policy.

The recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

8. How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Electronic Trading Platform.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims; and
- Deal with any complaints regarding the services.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

9. International data transfer

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under British Virgin Islands law.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us using the contact details below.

10. Electronic newsletters

If a user decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc.

11. Compliance with children's online privacy protection act

We do not accept users under the age of 18 and no part of our Website is structured to attract anyone under 18. By visiting our Website or using the Electronic Trading Platform, you are confirming that you are at least eighteen (18) years old and are agreeing to be bound by the terms of this Privacy Policy and the accompanying Terms of Use. If you do not agree, you should not use the Electronic Trading Platform or the Website.

12. Changes to this Privacy Policy

AlphaPoint Global has the discretion to update this Privacy Policy at any time. When we do, we may post a notification on the main page of our Website. Where changes to this Privacy Policy will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (*e.g.*, to object to the processing).

13. Your acceptance of these terms

If you do not agree to this policy, you should not use the Electronic Trading Platform or the Website.

14. Contacting us

If you have any questions about this Privacy Policy, our practices or your dealings with us, please contact us at: legal@apglobal.io

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.