PRIVACY POLICY





PRIVACY POLICY

1 Introduction

1.1. The Company complies with the applicable data privacy laws, where this Privacy Policy indicates how all obtained data from the Client are handled. Additionally, this Policy covers how the Company uses the Client's information and documents stated under the Know-Your-Customer ("KYC") Policy. Therefore, upon acceptance of the KYC Policy, the Client also agrees to the terms indicated under the Privacy Policy.

2 Data Disclosure

- 2.1. The Company does not sell, license, lease, or otherwise disclose the Client's personal information to any third party or affiliate if not deemed necessary.
- 2.2. The Company reserves the right to disclose the Client's information if such detail is required to provide the service or product the Client has requested or allow the Client to participate in the products or services the Company's affiliates offer.
- 2.3. General information about the Client will also be disclosed to affiliates that assist the Company in operating the Website, conducting the Company's business, or servicing the Client.
- 2.4. Under certain circumstances, the Company may disclose information to third parties, regulatory, law enforcement, or other government authorities if required.
- 2.5. In other instances, information about the Client will be disclosed if:
 - a. If it is required to comply with a legal obligation
 - b. If it is necessary to protect and defend the Company's rights or property
 - c. If it is to secure the safety of other Clients
 - d. If it is to protect the service or product of the Company
 - e. If it is needed to investigate suspicious trading and funding activities
- 2.6. The Client can obtain his/her personal information that the Company has collected through email request. However, for security purposes, the Company reserves the right to reject such data provision requests if it deems fit.

3 Collected Data

3.1. The Company only uses the collected information, documents, and data for reference and business transactions. Such information that the Client needs to provide includes but is not limited to full name and address, contact number, and email address. The Company stores all collected data and information for seven (7) years or until it deems it necessary.

Trading currencies and CFDs on Margin involves substantial risk and might not be appropriate for every investor. It is possible to incur a loss equivalent to or exceeding the entire capital. Before using Luzuna's services, please acknowledge all the potential risks of trading and assess whether the critical factors align with your ability to accept such risks. Such factors include your risk appetite, expertise, investing experience, and trading preference.



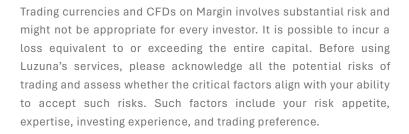
3.2. In some cases, the Company may collect other personal information from the Client depending on the nature of the appeal or use. These further personal details include but are not limited to social security numbers, account numbers, and mortgage or health information. The Company may also collect information regarding the Client's appointment on the Website for security purposes.

4 Privacy & Security

- 4.1. The Company uses security software, systems, and procedures to provide its clients with a safe and secure trading environment. The Company also utilizes a Secure Socket Layer ("SSL") encryption technology to protect the information provided through the Website. Additionally, in compliance with the Privacy Policy, the Company has established security methods to protect the Client's personal, financial, trading, and investing information.
- 4.2. Despite the Company's best efforts to protect the Client's information, the Company cannot and does not guarantee that the collected data or private communications will always remain private.
- 4.3. The Client acknowledges that the Company will not be liable if any third party unlawfully intercepts or accesses transmissions or private communications. The Company will presume that the Client understands and accepts this risk upon his/her use of the Company's services.
- 4.4. The Company regularly identifies, assesses, examines, and controls each type of risk related to its operations. In addition, the Company evaluates the effectiveness of the policies, arrangements, and procedures regularly to be able to cover the financial needs and capital requirements accordingly.
- 4.5. The Company is affiliated with top-tier banks that provide practical and adequate safety measures for the Clients' funds to be one of the industry's most reliable and transparent financial firms.

5 Encryption

- 5.1. The Company provides a secured connection using advanced firewalls and Secure Sockets Layers ("SSL") that encrypt and protect any information the Company's servers receive. This security protocol also prevents data theft and unauthorized access by third parties and keeps data integrity by ensuring that all data remains unchanged during transmission.
- 5.2. In terms of using or performing a transaction (deposit/withdraw) on the Company's Website, all collected data and information are encrypted, where a security protocol protects personal information entered on the Website to prevent data leaks.





6 Cookies

- 6.1. The Company uses cookies to obtain data to improve the Clients' trading experience. Cookies are small files from the Client's web servers that may be stored on his/her device.
- 6.2. Cookies enable the Company to see how the Client was able to access the Website, which pages are visited, and if the Client is logged on to the Website.
- 6.3. Cookies and other collected data from the Website will not be distributed or disclosed to third parties.
- 6.4. Cookies do not contain any account or password information, and the Company will not collect information about other websites the Client visits.
- 6.5. The Client can manage his/her allowed and blocked cookies through the web browser he/she uses. By visiting the Company's Website, the Client acknowledges the terms, conditions, and risks stated herein. The Client can still use the Company's services if he/she chooses to block the cookies from the Website, but some functions may be defective or not work as designed.



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