This Privacy Policy is applicable to Bluesuisse Markets Limited's website https://bluesuisse.sc/ (the "website") and our Apps.

Bluesuisse Markets Limited places a high priority on protecting and safeguarding our client's personal and financial information. Before submitting any personal data, a person should examine the given terms and should only continue by agreeing with the terms in the given Privacy Policy with principles set for data transfer, storage, and processing.

Bluesuisse Markets Limited takes your privacy very seriously. Our Privacy policy provides an overview of how Bluesuisse Markets Limited collects, processes, and uses your personal information that we obtain when you use the Bluesuisse Markets'services, visit our website or mobile application or otherwise interact with us, how we share and protect your information.

We may make changes to this Privacy Policy from time to time and it is important that you check this Policy for any updates. Any personal information we hold will be governed by current Policy at the given time. If we make any important changes, we will communicate them to you in a timely manner.

For the purpose of this Privacy policy "Processing of Client Data" means any action that is performed with the client data, including collecting, recording, structuring, safekeeping, changing, forwarding, deleting, archiving, etc.

Any reference to "we", "our", "us" means Bluesuisse markets Limited as the context requires unless otherwise stated.

Any references to "you", "your" or "yourself" is a reference to any of our clients and potential clients as the context requires unless otherwise stated.

Bluesuisse Markets Limited enforces stringent security procedures and systems to provide you a safe and secure operating environment.

#### What personal information do we collect?

The collection of personal information is only required when you submit a request via one of our online application forms (to learn more about one of) for our services or programs or when you apply to open an account with us.

By completing the account application form, you are requested to disclose personal information to enable Bluesuisse Markets Limited to assess your application. Bluesuisse Markets Limited needs to perform its due diligence measures and apply KYC's principles (Know-Your-Client) before entering a client relationship to prevent any suspicious actions, such as money laundering or terrorist financing and comply with the relevant laws (including their regulations). The information that we may collect from you includes the following:

1. Personal data, such as full name, date of birth, place of birth, residential address, and contact details (email address, telephone number, etc.).

- 2. Financial data, such as information about your income and wealth, including details about your source of funds, savings, bank account, e-wallets and credit card details, trading statements, tax and financial statements.
- 3. Profession and employment details.
- 4. Location data.
- 5. Knowledge and experience in trading, risk profile and risk appetite.
- 6. Details of your visits to our website and mobile Apps, including but not limited to traffic data, location and other communication data.

Therefore, we require all our clients' also to provide identity verification information:

- 1. Identity documents, such as government-issued national ID card or international passport, driving licence or other governmental proof of identification, as permitted by applicable laws.
- 2. Other authentication information, such as a recent utility bill or bank statement in order to verify their address.

If you are corporate client, we require to collect additional information, such as:

- 1. Corporate documents of incorporation
- 2. Company proof of address
- 3. Shareholders, directors' and officers' personal information, identity documents and other authentication information.

To verify your identity Bluesuisse Markets Limited can use third parties that carry out identity checks on its behalf.

We keep the right to ask for any additional information we deem necessary to be compliant with our legal and regulatory requirements.

#### How do we use your personal information?

Bluesuisse Markets Limited collects and uses personal information held about you for the following reasons:

- 1. To evaluate whether you are eligible for brokerage and other services available on our platforms and if they are appropriate for you.
- 2. To verify your identity and background before we decide whether or not we conduct business with you.
- 3. To open and maintain your account.
- 4. To comply with applicable laws or regulations.
- 5. To provide you with the services and products we offer and to notify you if there are any changes to our services or products (unless you tell us that you prefer us not to).
- 6. To ensure that our business relationship complies with all relevant regulatory obligations.
- 7. To handle any complaints or queries we receive from you.
- 8. To process payments from you and to you.
- 9. To improve our services and website.
- 10. To conduct customer surveys, marketing campaigns, market analysis, or promotional activities (with your consent).

11. For any other purpose for which your personal information was provided to us (with your consent).

### Who we share your personal information with, and in what circumstances?

Bluesuisse Markets Limited does not sell, lease or licence personal information to a third party, but we may disclose personal information to a third party for the following purposes after obtaining your express consent where legally required:

- 1. We may disclose your personal information to any relevant regulatory, governmental, or law enforcement authority as required by law.
- We may disclose your personal information to third parties necessary to provide you with information on products and services you requested, such as service providers and professional advisors contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or similar.
- 3. We may disclose your personal information (with your consent) to introducing brokers and affiliates with whom we have a mutual relationship and to attorneys acting under powers of attorney with you.
- 4. We reserve the right to disclose personal information to non-affiliated third parties for regulatory or reporting purposes as required by law, to protect our rights or property.
- 5. We may disclose your personal information to any organisation or person only if we are expressly instructed by you.

We will not disclose your information to any outside parties to allow them to market to you directly.

# How do we protect and safeguard your personal information?

Bluesuisse Markets Limited takes the safeguarding of clients' and partners' data very seriously. Within the framework of applicable laws, we ensure that client data is protected with the appropriate technical and organisational measures to prevent unauthorised access, unlawful processing or disclosure, accidental loss, modification, or destruction. In addition, employees, agents, partners, and third parties have only limited access to your personal information, strictly according to your given consent. Among implementation the organisational, physical, IT, and other necessary security measures to ensure the protection of client data, such security measures shall include the following activities:

- Internal rules of the requirements for processing, registering, and recording client data as well as procedures for checking compliance with those requirements.
- 2. Employees can access only necessary client data in a client database, which is strictly in accordance with their job duties performed.
- 3. Unauthorised processing of data or any other unauthorised use of data shall be prohibited.
- 4. Every user of the client database shall be issued a personal means of authentication, enabling them to use the database.

- 5. With the registration client provides personal information, which is classified as registered information and is saved in the client portal. The client portal could be accessed only with the username and password selected by the client. It is the clients' responsibility and obligation to protect and secure their login details (username and password).
- 6. When the client decides to cancel the registration process and not to complete it, the personal data provided at this stage will not be saved for further processing.

Bluesuisse Markets Limited is storing and using personal data based only on clients' consent. Clients may revoke consent at any time. However, any processing of personal data before the receipt of client's revocation will not be affected. If such consent is not given, Bluesuisse Markets Limited cannot process any persons' data, or services to the person in question. Clients have a right to withdraw their consent at any time by contacting <a href="mailto:support@bluesuisse.sc">support@bluesuisse.sc</a>, but please be aware that this is likely to have an impact upon the products and services we can provide to you.

# Your data protection rights

Bluesuisse Markets Limited respects the client's rights to access and control their personal data. Under certain circumstances, defined by law, client have the right to:

- Request Bluesuisse Markets Limited to provide a copy of the personal information held about the client. Bluesuisse Markets Limited shall protect its clients and ask individuals to prove their identity to minimise the risk of identity fraud.
- 2. Request inaccurate or incomplete data to be corrected by Bluesuisse Markets Limited. Bluesuisse Markets Limited has the legal right to request additional information or documentation to validate the need for the requested change of data.
- 3. Request to delete or remove personal data. Removing or deleting personal data will result in the closure of their account (s). However, Bluesuisse Markets Limited may have to maintain the client's personal data in order to comply with any applicable legal and regulatory requirements. Due to the anti-money laundering laws that Bluesuisse Markets Limited is subject to, we shall preserve data for at least five years following the termination of the client relationship, unless other terms for the preservation of data or documents are prescribed by law.
- 4. Request to restrict data processing. Clients may request to restrict the use of their data for marketing purpose by contacting <a href="mailto:support@bluesuisse.sc">support@bluesuisse.sc</a>.

# **Questions and Complaints**

If you have any questions or queries regarding our Privacy Policy, wish to access or change your information or would like to raise a complaint, please do not hesitate to contact us or request a callback.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can escalate your complaint to the data protection commissioner in your jurisdiction.