# 3. Privacy Policy

When you use our services, we collect and store personal data about you. This Privacy Statement (the 'Policy') informs you of the methods used to handle your personal data.

## <u>Information about the following is included in this Privacy Policy:</u>

- How do you get in touch with the person in charge of your personal data?
- In what ways do we obtain and what information do we gather about you?
- How do we make use of the information you provide about yourself?
- How do we keep our customers' personal information safe and secure?
- We share your personal information with whom?
- What about international organizations and third countries?
- When it comes to enforcing your rights, how do you go about it?

## WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND WHOM TO CONTACT?

The controller of personal data is Capital Chain with its registered office at 01, Ground Floor, Rodney Court Building, Rodney Bay, Gros-Islet, St Lucia, you can contact Capital Chain at info@capitalchain.co regarding any questions and the exercise of rights relating to the processing of your personal data.

#### WHAT AND HOW DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?

The information in this part is meant to give you a broad overview of how and what types of personal data we acquire from you. Personal data includes any information that can be used to identify or connect you to a specific individual.

When you use our services, you provide us with much of the information we need to know about you. In particular, this includes:

Specifically, whether you sign up for an account, provide personal information, place an order, participate in an event or project, or connect with us via customer service or social media. Identification and contact data include your name; surname; phone number; e-mail;

postal address; date of birth; username and password; and any warranty claims you may have made. Payment data include your bank account information; and other data, such as records of communication between you and our company or information about any warranty claims.

Your personal information that we automatically gather when you utilise our products or services. Among these are information about your device (such as your IP address), information about how you use a website (such as the time and date of your visit and the country from which you accessed the website), and information about how you use a service (such as the login and logout information, your account settings, the value of your fictitious capital, your account currency, business strategy)

If you choose to link your social networking accounts to your account on the website, third parties may give us information about you. Examples of these third parties include the providers of trading platforms on which you choose to trade using our services. Financial data (such as kind of instrument, time of starting and closing a trade), as well as data from social networks (such as profit or loss), are included (user name, profile picture, e-mail address associated with the account on the social network). For details on how trading platform providers and social network operators use your personal information for their own purposes, please refer to their privacy policies.

Additionally, when you provide your phone number during account creation, events, partnership, or any other form of communication with us, we may store and use this number for service-related and promotional communication purposes, including marketing outreach via manual or automated (AI-based) phone calls or SMS.

Do you know what we do with the information you provide us? This is how we make use of personally identifiable information:

Creating a user account and signing up

In order to utilise the services, you must register on the website and create an account, and we use your personal data for this purpose

## Personal information:

Your name, email address, and phone number are required to identify you and get in touch with you.

The legal justification for the processing of personal data:

You must provide your personal data to us in order for us to register your user account, as we cannot do so without it.

Providing services, exercising contractual rights and responsibilities, and so on: We need to process your personal data in order to offer you our services, i.e. to give you appropriate access, tools, and assistance, and to conduct transactions. As a rule of thumb, the following should be followed:

Personal data includes name, address, phone number, email address, payment information, information about how the service is used, information about simulated transactions, and information from social media profiles that you choose to link to your account on the website.

Legitimate interest or fulfillment of a contract under which we provide our services are both sufficient legal grounds for processing. We retain your personal information for a short amount of time after we no longer provide you with services. The processing is necessary to preserve and defend our rights, which are based on our legitimate interests.

Promotion of our products and services or participation in events:

The marketing messages we send to our existing and former customers will be based on our products and services. Commercial communications may also be sent to you, to the extent to which you have given us your permission. To make it easy for you to discontinue receiving

business communications, each email received will be clearly labelled as business communication and include a link that allows you to do so. As a rule of thumb, the following should be followed:

Personal information:

Contact information and identification.

The legal justification for the processing of personal data:

If you have used our services, we may occasionally contact you with marketing materials because we have a genuine interest in staying in touch with those who have used our services. If you agree to allow us to use your personal data for marketing reasons, we will do so.

Personal information:

If you contact us via social media, we collect your name, email address, phone number, and other personal information.

The legal justification for the processing of personal data:

Our legitimate interest in processing data is to keep our customers happy and to make our services more useful to them. Your personal data may be processed in order for us to create, test, improve, and secure some of our services if you utilise them. As a rule of thumb, the following should be followed:

Personal information:

Personal information, such as your name, address, phone number, and email address, as well as information about your device, the website, and your use of the services.

The legal justification for the processing of personal data:

Our legitimate interest in processing data is to make our services better.

Phone-Based Marketing Communication (Including Al-Based Outreach):

We may use the phone number you provide us during registration, events, partnership, or any other form of communication with us to contact you with marketing communications. These communications may include promotional messages, service updates, or product information, delivered via manual or automated (Al-based) phone calls or SMS.

- Personal data involved: Your phone number, and, where applicable, other identification and contact data.
- Legal justification for the processing of personal data: We process this data based on your consent or our legitimate interest in promoting and improving our services. You may withdraw your consent or opt out of such communication at any time.

## Analytics

We employ consumer behaviour analysis to learn more about how our website and services are being used. As a rule of thumb, the following should be followed:

#### Personal information:

Personal information, such as your name, address, phone number, and email address, as well as information about your device, your use of the website, and the results of your simulated trades.

The legal justification for the processing of personal data:

Our legitimate interest in processing data is to learn more about our customers' buying habits and preferences.

How do we keep our personal information safe?

Personal data is stored on computers and other devices in an encrypted database.

Organizational and technical safeguards have been put in place to protect the data that we collect and handle from unauthorized access, modification, disclosure, or destruction.

How long does it take us to process your information?

As stated above, personal data are only processed as necessary to accomplish the stated goals and for as long as is required by law. It is then destroyed or anonymized after that. For the following periods of time, we collect and use personal information:

The processing of personal data is limited to the duration necessary to carry out the agreement and to execute the parties' rights and obligations under it, such as handling complaints, resolving damage claims, or engaging in legal action.

if you don't give us permission to send you business communications, we keep your personal data for a maximum of 5 years from the end of your last contract with us or until you object or unsubscribe from the business communications; if we need to fulfill our legal obligations, we keep your personal data for the period set out by the relevant law;

## THIRD PARTIES USE OF YOUR INFORMATION:

In order to deliver our services, we make your data available or transmit it to the following people:

Simulated trades are made possible by your trading platform provider Website and service providers (such as other companies in the group, cloud service providers, payment system operators, financial institutions, service and support providers, IT companies, marketing and communication agencies, consultants, and postal service providers), as well as other third parties

In addition, we may send your personal information to parties for whom you have given your permission, as well as in circumstances where we are legally required to do so. The recipients of your personal data are contractually required to protect your information in accordance with applicable laws and to use it only in line with our instructions in accordance with the terms of their contract with us.

As data controllers, third parties gather personal information for their own ends. Personal data will be processed in accordance with their own guidelines in this situation.

#### YOUR RIGHTS

Send a request to info@capitalchain.co to exercise all of your rights, including the right to withdraw your permission. As a user, you have the following rights when it comes to personal data:

The right to access personal information

Whenever you want to know if your personal information is being used, you can ask us to give you a confirmation letter. If we do anything with your data, we'll let you know about it. The personal data we collect and use will be made available to you if you request it. The first copy is free, however, subsequent copies can be purchased for a nominal cost.

Individuals have the right to have their personal information corrected. Please contact us if your personal data is incorrectly processed and we will correct it as soon as possible. If you sign up for an account on the Website, you will be able to edit and correct your personal information.

The 'right to be forgotten' (right to deletion of personal data)

In the following circumstances, you have the right to have your personal data deleted from our systems immediately: As soon as the data gathered or otherwise processed is no longer required for the stated purposes, Your consent to their processing will be revoked if you do so and there is no other legal basis for their processing (this only applies in circumstances where we treat personal data on your consent). Processing for direct marketing reasons, if you object to the processing and there are no overriding legal grounds;

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If you believe that your personal data has been improperly processed, please contact us.

When a request is made for personal data to be erased, we will not be able to do so if their processing is necessary for exercising the right to freedom of expression and information; compliance with any of our legal obligations; performance of a task carried out in the public interest; establishment, exercise or defense of our legal claims; or other reasons permitted by law.

## The right to limit the use of data

Article 18 of the GDPR gives you the right to request a temporary halt to the processing of your personal data. Possession and use of information in a machine-readable format, as well as the right to access to such data When we process your personal information through automatic means, you have the right to receive the data in a structured, commonly used, and machine-readable format and to have it transferred to another personal data controller.

# The right to express one's views

You have the right to object to the processing of your personal data if we do so because it is in our legitimate interests to do so. Our ability to process your personal data is restricted if you raise an objection, and we must show that the processing is necessary to establish, exercise, or defend our legal claims and we have a compelling legitimate interest in doing so.

If you object to our use of your personal data for marketing purposes, we shall immediately stop doing so. Our ability to send you offers for our products and services will be terminated if you do this.

The ability to revoke consent

You have the right to revoke your consent at any time if the processing is based on that consent. The lawfulness of processing based on prior consent is unaffected by the withdrawal of consent.

The right not to be subjected to automated decision-making processes. You have the right not to be the subject of any decision based purely on automated processing, including profiling, that generates legal effects concerning you or otherwise affects you to a significant extent, unless this is permitted by relevant legislation or based on your express consent.

The right to file a complaint with the governmental agency responsible for investigating complaints.

You can file a complaint with the relevant supervisory authority if you believe that we are misusing your personal information. Our headquarters are located at this location.

## REQUIREMENTS TO BE MET

We reserve the right to amend this policy at any time, but we will notify you of any such change. A copy of this policy can be found in your Client Section. Use of your own affiliate link shall not count as affiliate commission.