

SafeCapital Ltd. Privacy Policy (version January 2021)



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1 INTRODUCTION

SafeCapital Ltd. (hereafter the "Company" or "UINVEX" or "we, us, our") is incorporated by the Business Companies of St Vincent and Grenadines with incorporation number 26037 BC 2020 and its registered office at Trust House, 112 Bonadie Street, Kingstown, POB 613 Saint Vincent and Grenadines. This Privacy Policy explains the way UINVEX collects, uses and manages, or arranges the processing of, personal information from its active clients and potential clients. UINVEX is committed to safeguarding your privacy. By opening a trading account with UINVEX, the client hereby gives explicit consent to such collection, processing, storage, transfer and use of personal information by UINVEX as explained below.

This Policy should be read must be read in conjunction with, and constitutes part of, the Customer Agreement and Terms of Business.

2 PRIVACY POLICY UPDATES

UINVEX's Privacy Policy Statement ("Privacy Policy") will be reviewed from time to time to take account of new technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current Privacy Policy Statement. The revised Privacy Policy will be uploaded in the UINVEX website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of UINVEX to its clients. If any of the changes made are of material importance then we will notify you by email or by means of a notice on the home page. UINVEX encourages its clients to periodically review the UINVEX website and this Privacy Policy so that they are always aware of what information UINVEX collects, how it uses it, and to whom it may disclose it, in accordance with the provisions of this Privacy Policy.

3 WHY DOES UINVEX COLLECT PERSONAL INFORMATION

Our goal is to fully satisfy our clients' requirements whilst meeting our obligations. To do this effectively, we need to collect and retain certain personal information. It is your choice to provide UINVEX with the information required and requested, however any missing information may result in UINVEX being unable to provide you with trading services and your account may not be approved, or if opened, may be terminated.

4 WHAT KIND OF PERSONAL INFORMATION DO WE ASK FOR?

In order for UINVEX to provide its clients with the investment services, UINVEX is required to collect, process and retain personal data of its clients. The type of personal information we may collect can include (but is not limited to)

- Personal information such as your name, address, nationality, date and place of birth, telephone number and employment details;
- Financial details such as your estimated annual income, estimated net worth, your source of funds/wealth and financial investment experience and knowledge;



• Documents that you provide to us to verify your identity, such as your passport or ID card, utility bills and/or bank statement.

We obtain most of the information directly from our clients through application or other forms, and from maintaining records of information provided in the course of ongoing customer service. We may also obtain information from other sources including, but not limited to, site area or residence visits, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, credit reference or similar third-party checks and references computer identification parameters, types of transactions conducted and documents downloaded. We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers.

5 HOW DO WE USE THIS INFORMATION AND TO WHOME WE MAY DISCLOSE IT?

Unless you are informed otherwise, the personal information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products and giving you ongoing information or opportunities that we believe may be relevant to you.

UINVEX will not disclose your personal information without your prior consent. However, depending on the product or service concerned and particular restrictions on sensitive information, this means that your personal information may be disclosed or transferred by UINVEX, whether within or outside the St. Vincent and Grenadines, to:

- Members of the UINVEX group of companies and affiliates
- Service providers and specialist advisers to UINVEX who have been contracted to provide us with administrative, legal, financial, audit, insurance, research or other services
- Introducing brokers or partners with whom we have a mutual relationship
- Courts, tribunals, government agencies and enforcement authorities,
- Credit providers, reporting or reference agencies,
- Third party authentication or verification service providers for fraud or crime prevention, antimoney laundering purposes, including identification or due diligence checks of the client
- Anyone authorized by an individual, as specified by that individual or the contract
- A prospective purchaser of the business of UINVEX, or its parent

In case such disclosure is required to be made, it will be made in order for UINVEX to comply with any obligations, protect itself from potential fraud, and maintain service provider agreements. In case such disclosure is required it will be made on a 'need-to-know' basis, unless otherwise instructed. Generally, we require that organizations not affiliated with UINVEX who process, handle or obtain personal information as service providers to UINVEX acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Data Protection Principles and this Policy.



6 SECURITY AND MANAGEMENT OF PERSONAL INFORMATION

Protecting the confidentiality of your personal information is of paramount importance to us here at UINVEX. We have in place both technical and organisational measures to guarantee your information is kept safe and secure. Our staff are trained to ensure client information is respected and handled appropriately, ensure the data of the client is confidential and the privacy of client is maintained. Any breaches of your privacy will be taken treated severely and will result in penalties, including dismissal and termination of contract where necessary.

7 HOW DO WE STORE PERSONAL INFORMATION?

UINVEX will keep your data on record for a minimum period of five (5) years from the execution of the transactions or the end of the business relationship.

8 PERSONAL INFORMATION ACCURATE AND UP-TO-DATE

UINVEX is committed to keeping data about you accurate and up to date. Therefore, the client should advise UINVEX of relevant changes to their details and personal information. However, when we consider information is no longer needed, and we are legally permitted to destroy or delete it, it shall be destroyed or returned to the client.

9 WHAT IS A COOKIE AND HOW DO WE USE COOKIES

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on the UINVEX site, including presenting web pages according to your needs or preferences.

UINVEX may also use independent external service providers to track the traffic and usage on the website. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of www.uinvex.com if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

10 LINKS TO THIRD PARTY WEBSITES

The UINVEX website may have links to external third-party websites that may benefit the user. Please note, however, that third party websites are not covered by UINVEX privacy policy and these sites are not subject to UINVEX privacy standards and procedures.



11 WHAT IF YOU HAVE A COMPLAINT?

If you consider that any action of UINVEX breaches this Privacy Policy or the Data Protection Principles or otherwise does not respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please email us at complaints@uinvex.com.

12 HOW TO CONTACT US

If you want to:

- make a general enquiry about the Privacy Policy
- understand your rights as a data subject
- change your personal information; or
- access your personal information

Write to us at: SafeCapital Ltd., Trust House, 112 Bonadie Street, Kingstown, POB 613 Saint Vincent and Grenadines or email us at info@uinvex.com

13 PRIVACY: WEB SUPPLEMENT

This statement outlines some privacy issues specific to the www.uinvex.com website.

13.1 TECHNOLOGY IMPROVEMENTS

UINVEX is constantly striving to improve functionality on this site through technology changes. This may mean a change to the way in which personal information is collected, processed, stored or used. The impact of any technology changes which may affect your privacy will be notified in this Supplement at the time of the change.

13.2 CHOICE AND OPT-OUT

During the registration process with UINVEX, you will be presented with the option to opt-out of subscribing to the following additional services:

- Marketing services, which provides you with information regarding the products and services offered by UINVEX or its partners; and opportunities that we believe may be relevant to you
- Newsletters
- SMS (text) messages
- Other electronic communications.

If you no longer wish to receive the above-mentioned communications, you may opt-out of receiving them by following the instructions included in each communication.