

The objective of this Privacy Policy is to set out in an accountable and transparent way the manner in which Ana Lee Capital (ALC) collects and uses your Personal Information.

1. Collecting Personal Information: If you wish to transact on and use the Site, ALC will collect information about you, including Personal Information. The Personal Information most often collected and maintained in a customer file included, but it is limited to name, address for service, government identification, and banking information for cash transaction.

Personal Information is collected in order to:

- 1.1.establish and maintain a responsible commercial relationship with you
- 1.2.understand your needs and eligibility for products and services
- 1.3.inform you about trading and financing features
- 1.4.provide information to you about developments and new products, including changes and enhancements to the Site
- 1.5.develop, enhance, and market products and services, and provide products and services to you
- 1.6.process billing and collection of any fees
- 1.7.conduct surveys and get feedback from you
- 1.8.deliver products and services to you
- 1.9.provide you with news and other matters of general interest to you as an AC customer, and
- 1.10.to meet ALC's legal and regulatory requirements.

The Site may use a browser feature called a "cookie" to collect information anonymously and track user patterns on ALC. A cookie is a small text file containing a unique identification number that identifies a customer's browser, but not the customer personally, each time that customer visits a websites using cookies. Cookies tell ALC which pages of the Site are visited and how many people visited each one. This helps enhance visitors' online experience. Cookies also serve to identify your computer so that your preferences can be saved for future visits, and ALC may work with third parties that use these cookies to help us.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be

able to use some of the features available on the Site.

2. **Consent:** Consent is required for the collection of Personal Information and the subsequent use or disclosure of Personal Information. The form of consent may vary, depending upon the circumstances and the type of Personal Information obtained. In the case of ALC, your agreement with the Terms of Service constitutes your consent to the collection and use of Personal Information as described in this Privacy Policy. Sometimes, ALC may reach out to you for consent to obtain and then use further information, and ALC reserves the right to do so. In exceptional circumstances, as permitted by applicable law, ALC may collect, use and disclose Personal Information without your knowledge or consent.

3. **Using Personal Information:** ALC is committed to protecting your privacy. Internally, only employees with a business need to know Personal Information, or whose duties reasonably require access to it, are granted access to customers' Personal Information. The Site's systems and data are constantly reviewed to ensure that you are getting the best possible service and that leading security features are in place.

We must reserve the right to retain and share certain Personal Information in order to meet our regulatory requirements and further to our contractual agreements with partners and third parties.

ALC uses IP addresses to analyze trends, administer the Site, track user movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes, ALC's web servers also automatically log standard access information including browser type, access times/open mail, URL requested, and referral URL. This information is not shared with third parties and is used only within ALC on a need-to-know basis. ALC reserves the right to block access for any user accessing the Site via a proxy service intending to conceal originating identity. This includes access via the Tor anonymity network.

Personal Information and other data may be exported outside of the jurisdiction in which you reside. Your Personal Information may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside.

4. **Protecting Your Personal Information:** This Privacy Policy and the use of your Personal Information only applies to the information you provide. You are cautioned that if you disclose Personal Information or personally sensitive data through use of the Internet, such as through chat rooms, communities, bulletin boards, or other public online forums, this information may be collected and used by other persons or companies over which ALC has no control. It is your responsibility to review the privacy statements, policies, terms, and conditions of any person or company to whom you choose to link or with whom you choose to contract. ALC is not responsible for the privacy statements, policies, terms, conditions, or other content of any website not owned or managed by ALC.

ALC does its best to protect and safeguard Personal Information, but there are protective measures you should take, as well. Do not share your Personal Information with others unless you clearly understand the purpose of their request for it and you know with whom you are dealing. Do not keep sensitive Personal Information in your e-mail inbox or on Webmail. If you are asked to assign passwords to connect you to your Personal Information, you should use a secure password and always use two-factor authentication (2FA), where available. You should change your password regularly.