



Privacy Policy

At **Initial Public Offering LTD** (hereinafter: "The company"), we value your privacy, and we work hard to keep it protected. Sometimes we will need to ask you for personal details in order to service your account.

The company takes your privacy seriously. We know that personal data is important to our customers, and we do our best to protect it. We realize the trust you have placed in us by providing your personal details, and we try to respond to it by using all the latest technological and legal solutions to deliver the necessary level of security. In view of this, we have implemented a new Privacy Policy which is fully compliant with Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR").

To comply with global industry regulatory standards, local industry regulatory standards, and government orders in different aspects such as Anti-Money Laundering (AML), Know-Your-Client (KYC), and Counter-Terrorist Financing (CTF), our company is required to collect personal information in addition to Identification Information, such as identity documents (including passport, driver's license, national identity card, state ID card, tax ID number, passport number, driver's license details, national identity card details, visa information, etc.), proof of address, source of fund declaration, purposes of fund documents, and source of wealth.

We will explain to you the content and requirements of such personal information each time we collect data. We reserve the right to change the content and conditions of the collected information as the global industry regulatory standards, local regulatory standards, or government orders change.

Privacy Policy:

This Privacy Policy covers the way the company collects and processes personal data of its customers. This Privacy Policy also covers the company collecting and processing of any personal data that our business partners share with us unless otherwise stated.

We will process any personal information provided to us, or otherwise held by us, in the manner set out in this Privacy Policy. Information may be provided or collected via the company's website, telephone calls, emails, or by any other suitable means.

By accepting this Privacy Policy, you agree that you understand and accept the use of your personal information as set out in this policy. Please do not use our website or provide us with your personal information if you do not agree with the terms of this Privacy Policy.

About our company:

We control the ways personal data is collected and processed and define the purposes for which it is used by our company, acting as the "data controller" for the purposes of applicable European data protection legislation.



Information we collect:

The information and data about you that we may collect, use, and process includes the following:

- Information you willingly provide to us by filling in forms on our Website.
- Any other information you submit to us via the website or email.
- Your responses to surveys or other research we carry out.
- Records of correspondence carried out via the Website, telephone, email, or other means.
- Information about the transactions you carry out with us.
- Information related to your visits to our Website including, traffic data, location data, weblogs, and other communication data.

Once you register with our company and access our platforms, you are no longer anonymous to us. Therefore, having been specifically informed about such processing by our Terms and Conditions, as well as the possible disclosure of personal data to third parties, you explicitly consent to such use of your personal data.

Cookies:

Our company may also assign your computer one or more cookies which may collect information in order to facilitate access to our Website and to personalize your online experience. It uses standard or non-standard internet tools, such as web beacons or monitoring programs, which collect information that tracks your use of the Website and enables it to customize our services and promotions. You have the right at any time to stop us from contacting you for marketing purposes and opt out at a later date. If you wish, you may choose and ask not to receive emails and/or newsletters from the Website, and/or delete or decline cookies by changing your browser settings.

A cookie is a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a website's server and stored on your computer's hard drive. By using our company's platform, you consent to the above use of cookies.

Why we process your personal data:

You have chosen our company as your gateway to the existing world of trading and investments. With the aim of providing quality service, we must collect and process a certain amount of personal data about our customers. This data will help us in a number of ways, including:

- Better management of customer relationships;
- Developing new products and services for our customers;
- Developing and managing existing products and services;
- Delivering quality products and services;
- Creating and managing customer accounts, payments, and withdrawals;
- Learning from how our customers use our products and services;
- Providing support for our products and services;
- Managing our relationship with and the performance of other companies that provide services to us and our customers;
- Responding to any customer complaints;
- Preventing and detecting improper use of our system;
- Managing risk for us and our customers;



- Complying with laws and regulations that apply to us;
- Fulfilling our obligations as an accountable and responsible organization;
- Exercising our rights set out in agreements and contracts.

Collecting personal data for the above-listed purposes is always justified by either your explicit and informed consent or by serving our legitimate interests. These are both recognized by the General Data Protection Regulation as acceptable legal bases for the processing of personal data. Bear in mind that if you choose not to provide your data, this may prevent us from fulfilling legal obligations, contractual responsibilities, or performing services required to run your account. Not providing your personal data may ultimately result in our inability to provide you with products or services.

All data collected by our company via an automated process will be used for general purposes such as technical administration of our company's platforms; research and development of the quality of services we provide – to customize the content you see, to contact you about special offers and new products and services, and other.

Keeping your data safe:

We have implemented appropriate technical and organizational measures to protect and secure the safety of your personal data. In addition, we have implemented various policies to further strengthen our commitment to your privacy. We use, to name a few, pseudonymization, encryption, access, and retention policies to guard against unauthorized access and unnecessary retention of personal data in our system.

It is safe to state that we have put all our efforts into ensuring that your personal data is properly protected and only used for acceptable purposes. We will only keep your data for the period that you are a customer of our company. Once you are no longer our customer, we will ensure that your data is kept for the minimum length of time required to comply with this policy, relevant regulatory, and legal obligations. We may keep your personal data longer if we cannot delete it for technical reasons.

Legitimate Interests:

Having a business or commercial reason to process your personal data constitutes a legitimate interest according to the General Data Protection Regulation. This does not mean we are at liberty to process your data in a way that would be unfair to you or your interests. If we use legitimate interests as a reason to process your personal data, we will notify you. You have the right to request further information about the exact nature of our legal interests, as well as to raise any objections you have for further processing on the same grounds. However, compelling grounds for processing such information may override your right to object.

Get in touch:

Do not hesitate to contact us if you have any concerns or would like to learn more about how we process your personal data. You can do that via our specially designated contact point at support@ipo-capital.net.



Possibility of sharing your personal data with others:

Depending on the products you have chosen or the type of service we are providing to you, we may need to share your personal data with certain types of organizations. They can be classified in categories of recipients, sharing the data with which could be justified on the same grounds:

- **Service Providers and Others:** We use certain types of technical service providers which help us maintain our website and the service in general operating.
- **Business Partners:** We may share your personal data in pseudonymized format with marketing partners and affiliates, who help us with promotional and advertising efforts.
- **Other of our company's affiliates:** We may share your personal data with our affiliates to carry out daily business operations and to enable us to maintain and provide a quality service to you.
- **Law Enforcement and Data Protection Authorities:** We may share your personal data if we believe it is necessary for us to do so in order to comply with legal obligations under applicable law, or respond to valid legal process, such as a search warrant or a court order.
- **Purchasers of our business:** In case we sell or negotiate to sell our business to a buyer or a prospective buyer, we may need to share some of your personal data.

We may transfer personal data outside of the European Economic Area (“EEA”) only with your explicit consent, unless the transfer is necessary for us to set up or fulfill a contract you have with us or to comply with a legal duty or obligation. In case we do transfer data outside the EEA, we will undertake all necessary and legal measures to ensure the same level of protection. We might rely on the following criteria to ensure that certain standards are maintained:

- Whether the country receiving your data has been found by the European Commission to provide the same level of protection as the EEA.
- Whether we are in a contractually binding relationship with the recipient which requires the same level of protection as within the EEA.
- Whether the recipient is from the USA and is registered with Privacy Shield (a framework, which ensures Personal Data is protected to a level approved by the