

# CPT<sup>+</sup>



## Privacy Policy



## **Privacy Clause**

It is one of our primary responsibilities to protect the privacy of our customers and visitors to our website and to ensure the security of their personal and financial information. The following privacy statement explains how CPT Global Limited collects and protects your information.

According to the privacy statement, once you open an account or use our website, you agree that we collect and use your personal information in accordance with the contents of this privacy agreement.

## **International Privacy Environment and Compliance**

CPT Global Limited is committed to protecting privacy under national and international data protection frameworks. We follow key global standards, including Article 12 of the Universal Declaration of Human Rights (UDHR), the OECD Privacy Guidelines, and the APEC Privacy Framework. We comply with relevant laws and regularly update our Privacy Policy to meet legal requirements and best practices, ensuring a transparent and secure privacy environment for users.

## **Personal Information Collection**

We obtain your personal information directly from you or indirectly through your relationship with us. We may apply the information gathered from you to: Confirm your identity and contact information, open your trading account, set up your trading account and password, maintain your account live, contact you for account-related information, or other reasons. This information can also help us improve the quality of our service, provide personalised browsing experience, and market products, services, offers and other information that might be of interest to you.

Most of the information we get is provided by you directly, including your name, mailing address, phone number, email and other contact information. In addition, we collect information that can identify you according to the law, including your passport number. We also collect personal background information when you open an account, including gender, date of birth, and employment status. Our regulators also require us to evaluate your trading experience, annual gross income, gross net worth and affordable venture capital to assess your financial situation.

You can provide this information to us by submitting an account opening application and related documents via our website.

Information we collect from you indirectly: Your IP address, browser type, operating system, network provider, server clock, and transaction record. If you close an account, we will retain your information but will only use it in compliance with regulatory requirements, as well as to contact you and provide the opportunity to re-open the account or participate in promotional activities.

## Sharing Personal Information with CPT Global Limited Affiliates and Partners

CPT Global Limited will not sell, license, lease or disclose your personal information to any members of the CPT Group, including any of our ultimate holding companies and their subsidiaries or third parties for any reason other than the following:

If your personal information is required to provide you with the product or service you requested, or to provide you with the product or service through our affiliates.

To improve the quality of our service, we may contract other companies to handle certain internal affairs, such as account processing, execution, customer service, customer satisfaction surveys or other data collection related to our business. We may also provide the database of our client information to nonaffiliated third parties, including name, address, phone number, and email, to help us analyse and clarify customer needs, product, and service information, or carry out general marketing and market research. To ensure that such products and services meet your needs and are available in an effective and appropriate manner, we may share a portion of your personal information with these non-affiliated third parties.

CPT Global Limited reserves the right to provide your personal information to third parties when required by law to provide relevant information to regulators, law enforcement agencies or other government agencies.

Any time you choose to purchase a product or service from another company, for example, by clicking on an advertisement on a website owned or controlled by CPT Global Limited, the personal information you share with that company will no longer be subject to our privacy statement. We are not responsible for the privacy policies or content of the sites we link to, and we cannot control the use of the information you provide or collect by these sites or protect such

information. Any time you choose to link to a joint site or visit a linked site, you may be asked to provide registration or other information. Please note that the information you provide will be submitted to a third party. You must first be familiar with the privacy policy published by the third party.

### **Security of Personal Information**

We use network security software, systems, and programs to provide you with a secure trading environment and protect your personal, financial, and trading information. When we open an account for you, you will be provided with a unique account number, username, and password. You are solely responsible for maintaining the confidentiality of your account information, including your account number, username, and password. We strongly recommend that you do not disclose this information to anyone. Any loss or damage resulting from your failure to maintain the security of your account credentials will be your sole responsibility, and we accept no liability in this regard.

Our website and online account opening page utilise encryption technology to secure the transmission of information and apply an e-business certification authority to authenticate our website, guarantee transactions, and ensure the safety of clients' online applications, helping you verify that you are connected to our genuine website. However, you are responsible for ensuring that you access our website through secure networks and that your devices are protected from unauthorised access, viruses, or malware.

### **Data Storage and Transmission Security**

We adopt physical and logical security measures to protect your personal information. Your information is stored in secure data centres with restricted access, accessible only to authorised personnel. Our systems are protected by firewalls, intrusion detection systems, and encryption technologies to prevent

unauthorised access.

All data transmitted between our servers and your devices is encrypted using industry-standard protocols, such as TLS. Sensitive data, including passwords and financial information, is encrypted both in transit and at rest. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

Cross-border data transfers are conducted in compliance with applicable data protection laws and are subject to appropriate safeguards, such as standard contractual clauses or binding corporate rules.

We regularly review and audit our security measures to ensure compliance with relevant regulations and industry best practices. You are solely responsible for maintaining the confidentiality of your account information and must take reasonable steps to protect it. We will not be liable for any loss or damage resulting from your failure to safeguard your account information.

### **Storage of Personal Information and retention period**

We will hold personal information for as long as we have a business relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a **period of 7 years** that enables us to:

- maintain business records for analysis and/or audit purposes;
- meet our regulatory requirements;
- comply with record retention requirements under applicable law;
- defend or bring any existing or potential legal claims; and
- deal with any complaints regarding the services.

The types of personal information we may retain include Customer Due Diligence Documents, Legal Instruments (e.g., Contracts), Communication Records, and Marketing Opt-Outs.

If there is any information that we are unable to delete entirely from our

systems for technical issues, we will put in place appropriate measures to prevent any further processing or use of the information. Once the retention period has expired, we will take appropriate measures to securely delete or anonymize your personal information unless we are required by law to retain it for a longer period.

### **Privacy Policy Changes and Exits**

Once CPT Global Limited updates the content of this privacy statement, the revised privacy statement will be posted to the website immediately. By opening our account, you agree that the electronic notice on the privacy statement issued on the website is actual notice.

In some cases, such as when we share your personal information with non-affiliated third parties, you can contact us through the following contact information to inform us that you wish to "exit" the privacy policy. If you have multiple accounts at CPT Global Limited, you must submit an exit request separately for each account.

Any dispute over privacy claims must be governed by this notice and the customer agreement of CPT Global Limited. If you have any other questions not mentioned in this statement, please contact our customer service representative.

### **Legal Disclaimer**

CPT Global Limited may disclose your personal information as required by rules and regulations and when we believe that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, or legal process, to governmental, intergovernmental, or other regulatory bodies. CPT Global Limited shall not be liable for misuse or loss of personal information or

otherwise on our website that we do not have access to or control over. CPT Global Limited will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your information/password by you or due to your acts or omissions or a person authorised by you.

### **Governing Law and Dispute Resolution**

This Privacy Policy, along with our collection, use, and storage of your personal information, is governed by and interpreted in accordance with the laws of Anjouan, Union of the Comoros, without regard to its conflict of law principles. Any disputes arising out of or in connection with this Privacy Policy will be resolved through the following mechanisms:

- **Negotiation:** We encourage you to contact us directly to resolve any concerns or disputes regarding this Privacy Policy. You can reach our customer service team at [support@cptmarkets.com](mailto:support@cptmarkets.com).
- **Legal Proceedings:** If a dispute cannot be resolved through negotiation, it may be submitted to the competent courts of Anjouan, Union of the Comoros, which will have exclusive jurisdiction over any legal action or proceeding arising out of or in connection with this Privacy Policy.
- **Alternative Dispute Resolution:** In addition to legal proceedings, we may consider alternative dispute resolution mechanisms such as mediation or arbitration, subject to the mutual agreement of both parties.

By using our website or services, you agree to the above dispute resolution mechanisms and acknowledge that the laws of Anjouan, Union of the Comoros apply to any matters related to this Privacy Policy.