

This Privacy Policy (this “Policy”) applies to the trading platform (including any applicable mobile applications and websites used to access the same) (collectively the “Platform”) provided by OMCrypto Fintech Limited (the “Company,” “we,” “us” or “our”). It describes how the Company collects, uses, and discloses Personal Information that we obtain from Users of the Platform and any account services provided through the Platform, and how we use and disclose that information. For purposes of this Policy, “Personal Information” refers to information supplied by a User from which the identity of such User may be directly or indirectly determined.

By registering for and using the Platform, you agree that your Personal Information will be handled as described in this Policy and the Terms and Conditions applicable to the Platform (the “Service Agreement”); capitalized terms used herein shall have the same meaning as set forth in the Service Agreement.

The Information We Collect About You and How We Collect It

We collect and process Personal Information about you directly from you when you register to use the Platform or submit such information as a part of the Know-Your-Client (“KYC”), as well as automatically through your use of the Platform.

Information We Collect Directly From You.

Personal Account and Profile Information: There are several types of accounts that can be established on the Platform. We collect the following information when you register an Account: name, mobile phone number and/or email address. When your Account meets certain standard, we may collect additional information: name as in identity card/passport, identity card/passport number, date of birth, nationality, mailing address, residential address, mobile phone number and email address

Financial Information: We may collect additional financial and investment information from you to confirm your status and eligibility to set up other types of accounts or conduct certain transactions on the Platform, including your investment experience, finance-related qualifications and training (including any certifications received, issuing organization and date of issuance), your annual income level, liquid net worth, estimated net worth, source of funds, and source of wealth and whether you have had the opening of an account declined by another financial institution.

Other Required Information: We may need to collect certain additional information to comply with legal requirements, such as whether you are a Politically Exposed Individual or on any restricted persons list, and applicable tax reporting forms, such as a W8-BEN.

Communications with Us: We collect information you give us during any support and feedback communications via email or when you contact us through contact forms on the Platform. We use this information to respond to your inquiries, provide support, facilitate transactions, and improve our Platform.

Please note that if you are acting as an Authorized Individual on behalf of a User and are providing Personal Information for such User, you are responsible for ensuring that you have all required permissions and consents to provide such Personal Information to us for use in connection with the Platform and that our use of such Personal Information you provide to the Platform does not violate any applicable law, rule, regulation or order.

Information We Collect Automatically.

When you use the Platform, our servers automatically record information using cookies and other tracking technologies, including information that your browser sends whenever you visit the Platform or your mobile application sends when you're using it. This log data may include your Internet Protocol address, the

address of the web page you visited before coming to the Platform, your browser type and settings, the date and time of your request, information about your browser configuration and plug-ins, language preferences, and cookie data. Such log data is not routinely deleted.

In addition to log data, we may also collect information about the device you use for the Platform, including what type of device it is, what operating system you're using, device settings, unique device identifiers, and crash data. Whether we collect some or all of this information may depend on what type of device you're using and its settings.

We may combine this information with other information that we have collected about you, including, where applicable, your name, user name, email address, and other Personal Information.

Geolocation. If you have provided permission through your mobile device to allow us to collect location information through a mobile application, we may obtain your physical location information in terms of latitude and longitude from technologies like GPS, Wi-Fi, or cell tower proximity. You are able to withdraw your permission for us to acquire such physical location information from your mobile device through your mobile device settings, although we do not control this process. If you have questions about how to disable your mobile device's location services, we recommend you contact your mobile device service provider or the mobile device manufacturer.

How We Use Your Information

We use your information, including your Personal Information, for the following purposes:

- To provide our Platform to you, to facilitate communications and transactions on the Platform, to communicate with you about your use of our Platform, to respond to your inquiries, to fulfill your orders, and for other customer service purposes;

- To tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using our Platform;

- To better understand how users access and use the Platform, both on an aggregated and individualized basis, in order to improve our Platform and respond to user desires and preferences, and for other research and analytical purposes;

- For marketing and promotional purposes. For example, we may use your information, such as your email address, to send you news and newsletters, special offers, and promotions, to conduct sweepstakes and contests, or to otherwise contact you about products or information we think may interest you. We also may use the information that we learn about you to assist us in advertising our Platform on third-party websites.

How We Share Your Information

- Affiliates. We may disclose the information we collect from you to our affiliates or subsidiaries solely for the purpose of providing the Platform to you; however, if we do so, their use and disclosure of your personally identifiable information will be maintained by such affiliates and subsidiaries in accordance with this Policy.

- Service Providers. We may disclose the information we collect from you to third-party vendors, service providers, contractors or agents who perform functions on our behalf, provided such third parties have agreed to only use such information to provide services to us.

- Business Transfers. If we are in negotiations with, or are acquired by or merged with another company or entity, if substantially all of our assets are transferred to another company or entity, or as part of a bankruptcy proceeding,

we may transfer the information we have collected from you to the other company or entity.

·In Response to Legal Process. We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena.

·To Protect Us and Others. We also may disclose the information we collect from you if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Service Agreement or this Policy, or as evidence in litigation in which we are involved.

·Aggregate and De-Identified Information. We may collect, process, analyze and share aggregate or de-identified information about users with third parties and publicly for product development, marketing, advertising, research or similar purposes.

Our Use of Cookies and Other Tracking Mechanisms

We and our third-party service providers use cookies and other tracking mechanisms to track information about your use of our Platform. We may combine this information with other Personal Information we collect from you (and our third-party service providers may do so on our behalf).

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Platform, while others are used to enable a faster log-in process or to allow us to track your activities at our Platform. There are two types of cookies: session and persistent cookies.

·Session Cookies. Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Platform. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Platform.

·Persistent Cookies. Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity.

Please note that our systems do not currently respond to do-not-track signals.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The general settings on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Users of our Platform who disable cookies will not be able to browse certain areas of the Platform.

Third Party Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Platform. We also may use other analytic means to evaluate our Platform. We use these tools to help us improve our Platform, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your Personal Information with these third parties.

Third-Party Links

Our Platform may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

Security of Your Personal Information

We have implemented reasonable precautions consistent with applicable laws and regulations to protect the Personal Information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee 100% security. Therefore, all Users (including their Authorized Individuals) of the Platform must comply with the security requirements in the Terms and take the following additional steps to help ensure the security of their Personal Information and the access to their account:

(a) You should choose a robust user identification, password, and PIN to access your account (“User Credentials”) that nobody else knows or could easily guess. User Credentials must meet the requirements we specify when you establish those User Credentials. You should keep your User Credentials secure and private, and not share your User Credentials with any third party.

(b) You should install anti-virus, anti-spyware, and firewall software in your personal computers and mobile devices;

(c) You should update operating systems, anti-virus, and firewall products with security patches or newer versions on a regular basis;

(d) You should remove file and printer sharing in computers, especially when they are connected to the internet;

(e) You should make regular backups of your critical data;

(f) You should consider the use of encryption technology to protect highly sensitive or confidential information;

(g) You should completely log off and clear your browser cache after finishing each online session with the Platform;

(h) You should not install software or run programs of unknown origin;

- (i) You should delete junk or chain emails;
- (j) You should not open email attachments from strangers;
- (k) You should not disclose personal, financial, or credit card information to little-known or suspect websites;
- (l) You should not use a computer or a device that cannot be trusted; and
- (m) You should not use public or internet café computers to access online services or perform financial transactions.

You should immediately notify us at support@omtrade.com if you become aware of any unauthorized use or access of your Account or User Credentials. We are not responsible for any lost, stolen, or compromised User Credentials or for any activity on your Account via unauthorized activity using your User Credentials.

Rights of access, correction, and deletion

You can access, edit, update, or delete your Account or Personal Information we have collected at any time by accessing your account settings or emailing us at support@omtrade.com. We will respond to your requests within a reasonable period of time, but no later than the time period required by law.

Please note that notwithstanding the foregoing, there may be circumstances in which we are unable to accommodate a request to edit, update, access, or delete an account profile or Personal Information. This includes but is not limited to:

- any basis where such request can be denied under applicable law;
- where we need to retain the information to comply with federal, state, or local laws or for accounting or tax purposes;
- where we need to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;

- where we need to cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law;
- where we need to retain information to exercise or defend legal claims;
- where the information contains legal privilege or proprietary information of another party; or ·where complying with the request would compromise others' privacy or other legitimate rights.

If we determine that we cannot respond to any request in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before responding to any request under this provision, including complying with any applicable legal requirement for verifying your identity.

Transfer of Information

Please note, we may store your Personal Information on servers located in the countries where our main offices are located. If such jurisdiction is outside your jurisdiction of residence, you consent to the transfer of your Personal Information to such jurisdiction for purposes of providing the Platform to you, even if such other jurisdiction has less protections for Personal Information than your jurisdiction of residence. We will ensure that security provisions are in place consistent with our obligations to maintain the security of your Personal Information under the laws of your jurisdiction of residence.

Retention

We retain your Personal Information as long as you maintain an Account on the Platform. We will cease to retain your Personal Information, or remove the means by which the Personal Information can be associated with particular individuals, as soon as it is reasonable to assume that —

(a) the purpose for which that Personal Information was collected is no longer being served by its retention; and

(b) retention is no longer necessary for legal, accounting or business purposes.

Please note that certain laws may require us to retain records of transactions or accounts for a certain period of time.

Children Under 18

Our Platform is not designed for children under 18. If we discover that a child under 18 has provided us with Personal Information, we will delete such information from our systems.

Contact Us

If you have questions about the privacy aspects of our Platform or would like to make a complaint, please contact us via our live chat services or at support@omtrade.com

Changes to this Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on the Platform. If we make any changes to this Policy that materially affect our practices with regard to the Personal Information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Platform or providing a push notification through the Site (you should make sure your Site settings allow for such push notifications) or sending an email that you have provided in your Account, (for this reason you should make sure to update your account information promptly if it changes).