



NAGA

**NAGA Global Ltd
PRIVACY POLICY**



INTRODUCTION

NAGA GLOBAL LTD is a company incorporated under the laws of Saint Vincent and the Grenadines as an International Business Company with Registration 24501 IBC 2018 and located at Trust House, 112 Bonadie Street, Kingstown, Saint Vincent (hereinafter referred to as the “**Company**” and/or “**NAGA**” and/or “**we**”). The Company is authorised under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009 (herein the “**Law**”).

This Privacy Policy (hereafter referred to as the “**Policy**”) of the Company sets out how the Company and/or additional entities under the NAGA Group to whose services/website you have registered collects, uses and manages the personal information and data it receives from you and is applicable to all websites, applications and services offered by the Company. Specifically, it shows how we comply with related laws and regulations on a national and international level. The Company is committed to safeguard the applicable laws and regulations by adhering to strict security standards and using the most up to date security technologies.

You are strongly advised to read this Policy carefully, as it is part of the Company’s legal documentation available on the official website of NAGA: www.naga.com (hereafter referred to as the “**website**”) as may be amended from time to time. If you have any questions about this Policy, please do not hesitate to contact us via email at support@naga.com or at dataprotection@naga.com.

SCOPE AND PURPOSE

The privacy of everyone we work with is of utmost importance to us, and it is our priority to safeguard and respect the confidentiality of your personal information and data as well as your rights. By entrusting us, we would like to assure you of our commitment to keep your personal information and data private.

The purpose of this Policy is to inform the readers how the company handles their personal information and data and therefore it applies to all activities of the Company which involve the handling of reader’s personal information and data.



APPLICATION

This Policy is applicable to the Company as well as other subsidiaries and/or affiliates and/or any other entity under the NAGA brand which is handling personal information and data in accordance with the provisions herein. Therefore, the Company has taken measurable steps to protect the confidentiality, security and integrity of your personal information and data as illustrated herein.

COLLECTING YOUR PERSONAL INFORMATION

The Company needs to collect your personal information and data in order to provide its services as well as perform the Company's daily business operations. Indeed, when you visit, submit a form, email via the Company's website and/or applications and/or services, you give us your personal information and/or data which will keep so that we can contact, and/or provide our services and/or email you back.

From time to time we may also request further information to help us improve our service to you or our activities under our relevant Agreement or comply with applicable laws and regulations. For that reason, we would contact you and it would be disclosed to you in case our communications will be recorded, electronic, by telephone, in person or otherwise.

Additionally, we may receive your personal information and data from third parties via publicly available sources and/or entities which we collaborate with in order to provide our services. This is when we obtain technical data from analytics providers such as Google based outside of EU; contact, financial and transaction data from providers of payment services based inside the EU; and/or identity and contact data from individual and publicly available sources, such as Registrar of Companies based inside EU and Thomson Reuters based outside of EU.

On a similar manner, we can collect information as a result of your use of our services. This will include information from our tracking systems used by the Company via which we may collect your personal data to optimise the services provided to clients and potential clients such as location information by using your IP address which helps us to localize our website content, which we provide to you based on your country, and improve your user experience on our site, cookies for which you can find more



information about why we use them in our Cookie Policy and always change your preferences via the website settings on your browser.

Generally speaking, the information we ask you include your full name, gender, residential address, date and place of birth, information necessary to verify your identity such as a passport or identity card, contact details such as valid e-mail address, payment details such as credit card, debit card and bank account details, profession and employment details, information on your wealth and annual income, trading knowledge and experience, and other necessary financial information.

HANDLING OF YOUR PERSONAL INFORMATION AND DATA

The Company will use, store and handle your personal information and data in connection with the furthering of the Agreement between NAGA and the clients, in accordance with relevant national and international laws and regulations. The Clients' personal information and data which is not in the public domain or already possessed by the Company without a duty of confidentiality and is held by the Company, will be treated with high levels of confidentiality.

The Company will not use them for any purpose other than in connection with the provision, administration and improvement of our services, applications and website towards our Client. The purposes for which we may process your personal data are exhibited and explained below.

We process personal data to provide our services and products, as well as information regarding these services and products, based on the contractual relationship with you. We need, therefore, to use your personal information to perform our services and comply with our obligations to you. In this framework, we need to verify your identity to accept you as our client, and we will need to use those personal details to effectively manage your trading account with us.

The Company is subject to the provisions of the Freedom of Information Act of 2000 as well as other national and international laws and regulations which are relevant to the business of the Company. Provided that the Company is processing personal data of EU data subjects, it must be noted that personal data will be handled in accordance with the good practices suggested by the General Data Protection Regulation of the European Union (hereafter referred to as the "GDPR").



The Company handles personal data to safeguard the Company's legitimate interests for initiating legal claims and preparing our defence in litigation procedures and processing personal data for risk management purposes. Further, the Company may need to use personal information and data collected from you to investigate issues or to settle disputes with you because it is in our legitimate interests to ensure that issues and disputes get investigated and resolved in a timely and efficient manner.

In general, it must be noted that our storage and use of your personal information and data are based on your consent provided by opening an account and subsequently using the website, and/or services, and/or applications of the Company. Please be informed that you have the right to revoke consent at any time, by contacting us at dataprotection@naga.com. If you have consented to be contacted by us for marketing purposes, we may use your personal information to send you marketing communications by email or phone or other agreed forms to ensure that you are kept up to date with our latest products and service but never disclose your information to any outside parties.

Your personal data, which includes your knowledge and experience in the financial products that we offer, is used to form your economic profile and confirm our assessment of the degree to which such financial products are appropriate to you. From time to time, we may send you surveys as part of our customer feedback process. It is in our legitimate interest to ask for such feedback to try to ensure that we provide our services and products at the highest standards. We may use the personal information provided by you through such client surveys to help us improve our products and services. Finally, we may inform you of changes to the terms or the features of our products or services and doing so implies that we will maintain and use your personal data.

DISCLOSURE OF YOUR INFORMATION

The Company reserves its right to disclose personal information and data of the its clients in certain circumstances. According to the Client Agreement with the Company and NAGA we may disclose personal information and data:

- a. where required by law or a court order by a competent Court; and/or



- b. where requested by a competent national authority which has control or jurisdiction over the Company or our associates or in whose territory, we have Clients or Providers, as applicable; and/or
- c. where is requested by relevant authorities to investigate or prevent fraud, money laundering or other illegal activity; and/or
- d. where required by a broker in order to execute your instructions or orders and for purposes ancillary to the provision of our services to you as our Client.

Additionally, disclosure may be required to credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of you. To do so they may check the details you supplied against any details on any database public or otherwise, to which they have access.

They may also use your details in the future to assist other companies for verification purposes and a record of the search will be retained by us. Finally, disclosure of your personal information may occur to other service providers for statistical purposes, to improve our marketing, in such a case, the data will be provided in an aggregated form and our employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.

INTERNATIONAL TRANSFER OF PERSONAL DATA

Some the third parties we collaborate with may be based outside or within the European Economic Area (hereafter referred to as the “**EEA**”) or the European Union (hereafter referred to as the “**EU**”). Therefore, your personal data may be transferred and further processed outside or within the EEA and/or the EU respectively.

Irrespective of the location of our partners, we transfer your personal data by adopting high degree of protection and further try to transfer your personal data only to countries with sufficient level of protection for personal information and data and to which we have accessed their business.



Additionally, we use specific contracts with all our service providers which follow the standards and requirements of the GDPR and relevant suggestions of the European Commission (hereafter referred to as the “EC”).

STORAGE YOUR PERSONAL INFORMATION

As part of becoming a member of the Company, you must submit validation documents which will further be transmitted over a secure connection and stored in a safe location. Periodically, we may use third party vendors, such as Google and AdRoll, to display our ads over the internet to you, based on your previous use of our website. Please be informed that all personal information and data is stored on secure servers handled by the Company and only those employees or partners that need to know the information in order to enable the carrying out of the Agreement between us will have access and solely for the purposes of the provision of the services.

The Company has procedures and policies in place for safeguarding and use all personal information and data we hold. This is achieved by requesting our employees, sub-contractors and/or third parties to maintain the confidentiality of any personal information and data they hold that resulted from the Company by adopting the necessary technical and organisational measures and procedures. This is included in the contract we have with these parties and hence we ensure that your personal information and data always remains secure. Finally, we invest in the human factor heavily and we regularly train and raise awareness of our members of staff to the importance of maintaining, safeguarding and respecting your personal information and data as well as privacy.

RETENTION PERIOD OF YOUR PERSONAL INFORMATION

Whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium, we will hold personal information and data you disclose to the company confidential. Indeed, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.



When we consider that personal information and data is no longer necessary for the purpose for which it was initially collected, we will remove that and securely destroy the records. However, we may need to maintain records for a significant period after you cease being our client, in accordance with relevant laws and regulations.

YOUR RIGHTS AS DATA SUBJECT

The Company can answer any concerns you may have in respect of the Policy and your rights as “**data subjects**” by sending an email at dataprotection@naga.com. Please note that as per our procedures, the Company reserves the right to request any further information and/or completion of relevant documentation, in order to verify your request.