



## **PRIVACY POLICY**

**2024**

## Introduction

MIRABAUD GROUP LTD (hereafter the “Company”) is a Vanuatu Investment firm, incorporated and registered under the laws, rules and regulations of the Republic of Vanuatu with a registration number 17910. The company is fully authorised and regulated by the Vanuatu Financial Services Commission (hereafter the “VFSC”) with Dealing in Securities Principal’s License ..

This policy is created to reflect, inter alia, the Company’s obligations under the Dealers in Securities (Licensing) Act [CAP 70] (as it may be amended from time to time) and the Guidance Notes on Market Practice and Code of Conduct for Financial Dealers.

Where the Company collects and processes data of EEA residents, the Company shall also comply with the General Data Protection Regulation (EU) 2016/679 (GDPR).

For the provision of services from our Company, we require to collect personal information during the registration and throughout the time that you use our services. This Policy intends to explain how any information you provide us will be used and utilised. Any personal information that we hold, will be governed by the most up to date Privacy Policy.

## Information to be collected and reasons for collecting personal information:

The company will collect the necessary information including but not limited to:

- Names
- Email address
- Date of Birth
- Place of Birth
- Gender
- Home address
- Profession and Employment details
- Bank details
- Economic profile (including information about your income, wealth, details about your assets and any trading history)
- Information on whether you are a Politically Exposed Person (PEP)
- Tax residence and Tax Identification number
- Photo ID or Passport
- Any other required personal data

**The reasoning for the above is but not limited to:**

- Identify clients and carry out the appropriate due diligence before the onboarding procedure is complete
- Screen and use third-party sources to check the validity of the information provided (including but not limited to conducting background checks and demographic information)
- Build an Economic Profile during the registration process.
- Communicate with the client
- Safeguard client's assets
- Provide services to the client
- Fulfil our statutory obligations (including compliance and regulatory reporting)
- To improve the services provided to clients
- Marketing purposes
- Legal notifications

Any information that is collected, can be done so through numerous ways including the website, mobile app, account opening and registration, demo sign ups and any information collected during customer service communications. Information may also be collected from any medium which makes information publicly available. (e.g. Social Media and other service providers)

To comply with further regulations, we may keep records of you trading activities and behaviours, including reports, statements, and trades for the following:

- Products traded on our platform and their overall performance
- Historical data and investments you have made during our time with us, including amounts invested
- Preference in the type of products

The Company maintains the right to record any communications, either electronic, by telephone, in person or other methods not limited to the aforementioned, in relation to the services provided to you and your business relationship with our Company. These communications shall constitute Company property and will be considered as evidence of our communications between us and our clients.

**How information is used and protected:**

**Use of Information:**

Client information may be used and processed for the purposes of sending marketing communications by the prescribed modes mentioned above (email, telephone, and others) or any other mode as agreed in advance. The purpose of the marketing communications is to keep clients up to date with the latest developments, announcements and other information about the Company's services, products and technologies.

In addition, we may process Client information in order to conduct client surveys, marketing campaigns, market analysis, or promotional activities. We may also collect information about your preferences to create a user profile to personalize and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics). Client data may also be used to perform an enquiry concerning your complaints.

As per the legal and regulatory requirements we may also come in contact with clients to inform them regarding changes in products, services, or legislation. Such communications shall continue regardless if clients opt out of receiving marketing materials. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any client wishing to opt out of receiving any further communications regarding promotional offerings, may do so by informing the company at support@freedom27.com

**Protection of Information:**

Any information provided to the Company are considered as confidential and will be treated as such. Sharing of the information will be only within the Company and its affiliates and will not be shared with any third parties except under regulatory or legal proceedings or any other disclosure reasons as required by the law or regulatory authority.

We may also provide your personal data to tax authorities or organizations that require the data to be provided in order to comply with laws against money laundering and financing terrorism, or when necessary to protect our rights or property. We may pass your personal data on to third party authentication service providers when you use our system to perform

identity checks and documents verification - we do this in order to comply with our legal obligations. When transferring your information to third parties, we maintain the confidentiality and security of the information being transferred.

**Affiliates and Partners:**

Information may be shared with affiliates to a reasonable degree, in which to assist the affiliate to provide a client the Company's products and services. Information may be shared with affiliates and partners to provide offers and products which meet the client's needs and requirements. Such information will be shared, if they are useful, and the clients have authorised the Company to do so.

**Non-Affiliate third parties:**

The Company does not sell or otherwise disclose client information to third parties except as notified in this Policy.

**Additional Rights of Clients residing within the EEA:**

Clients residing within the EEA, whose personal information is processed by the Company, have the following additional rights regarding their personal information held:

- Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.
- Right of rectification – you have a right to request from us to correct the personal data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal data from our records.

In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation), the Company acting as your controller will erase your personal data from its records.

- Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.
- Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply, the Company will transfer your personal data to another organisation.
- Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

In respect to the aforementioned rights, we will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data. You can send the relevant request to the following e-mail address: [support@freedom27.com](mailto:support@freedom27.com)

### **Transferring your Personal Information outside the European Economic Area ("EEA") (if GDPR applies)**

Information/Clients subject to the General Data Protection Regulation (EU) 2016/679 (GDPR), may be transferred out of the EEA to countries that do not uphold the same standard of data protection as the laws of your home country (e.g. the laws within the EEA). In doing so, the Company shall ensure that it maintains the same levels of protection and suitable safeguards to comply with the GDRP or other relevant legislation.

Any information of persons covered by the GDPR shall be transferred using an adequate level of protection using the appropriate mechanisms established to facilitate such transfers.

When we transfer your data to other third parties outside the EEA such transfers will comply with the GDPR, and hence we may in some cases rely on a Commission Adequacy decision, or appropriate safeguards (e.g. applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements) or other grounds provided by the GDPR. You may contact us at any time if you would like further information on such safeguards.

**Keeping Information Up to date:**

If any of the original information provided during registration have changed, it is the client's responsibility and obligation to update the Company of such changes immediately. Failure to do so could result to suspension of the client's account or permanent removal from our services.

**Use of Cookies:**

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience.

You can find out more about our cookies on our "Cookies Policy" available on our Website. We may use external organisations to help manage, update, create and maintain our website, analysing all statistical data collected. Such organisations may install and use their own cookies on our behalf.

**Storage of Personal Information:**

Keeping client and other information secure is of great importance to our Company and any such information held, however they may have been collected, shall remain in the Company's records throughout the period in which a client has a business relationship with us.

Records of all information may be kept in secure computer storage, paperbased files and other records, taking all appropriate measures to protect such personal information from being lost, misused, modified or disclosed.

We may maintain records for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve Client Information in connection with litigation, investigations and proceedings. Further to the time mentioned above, records will be securely destroyed and removed from our possession. Communications between the Company and Clients will also be held for a period of up to 5 (five) years.

**Restriction of Responsibility:**

The Company does not hold any responsibility and shall not be held responsible for the Privacy Policies of any other third-party company, or partner that may be linked to it. The company also has no control on how Client information will be used by such third-parties or partners.

The Company shall not be liable for information provided by the client to any linked websites which are not operated by the Company. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

**Changes and Updates to this Privacy Policy:**

This Privacy Policy is reviewed once a year taking into account the changes in local and international legislation but also the changing environment and advances in technologies. This is to ensure that it remains appropriate to the changing environment. The Company shall inform Clients about any changes in this Privacy Policy document and as to how their information is affected following the aforementioned changes