ORBI TRADE

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PRIVACY POLICY ORBI TRADE

PRIVACY POLICY AND CONFIDENTIALITY POLICY

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www.orbimarket.co

Part 1: PRIVACY POLICY

1. Introduction

ORBI TRADE INTERNATIONAL LTD (the "Company")

The Company is authorized by the Financial Services Authority of Seychelles with Securities Dealer's License Number SD165.

Our Privacy Policy governs the Client visit to **https://orbimarket.co/**, and explains how the Company collect, safeguard and disclose information that results from Client use of Company Service.

The Company use Client data to provide and improve Service. By using Service, the Client agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in the Company Terms and Conditions.

The Company Terms and Conditions govern all use of Company Service, and together with the Privacy Policy constitute the Client agreement with the Company.

2. Definitions

- **SERVICE** means the https://orbimarket.co/ website operated by ORBI TRADE INTERNATIONAL LTD
- **PERSONAL DATA** means any information relating to a living individual who can be identified from that information (either alone or in combination with other information in our possession or likely to come into our possession)
- **USAGE DATA** means data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit)
- **COOKIES** are small files stored on the Client device (computer or mobile device)

- **DATA CONTROLLER** means a natural or legal person who, alone or jointly with others, determines the purposes and means of processing Personal Data. For the purpose of this Privacy Policy, the Company are a Data Controller of the Client Personal Data
- **DATA PROCESSORS (OR SERVICE PROVIDERS)** means any natural or legal person who processes the Client data on behalf of the Data Controller. The Company may use the services of various Service Providers to process the Client data more effectively
- **DATA SUBJECT** means any living individual who is the subject of Personal Data
- **THE CLIENT** means the individual using our Service. The Client corresponds to the Data Subject, who is the subject of Personal Data

3. Information Collection and Use

The Company collect several different types of information for various purposes to provide and improve our Service to the Client.

4. Types of Data Collected

The Company may collect, use, store and share different kinds of Client data, such as:

- Personal Data

  While using the Company Service, the Company may ask the Client to provide with certain personally identifiable information that can be used to contact or identify the Client. Personally identifiable information may include, but is not limited to:

  1. Name;
  2. Surname;
  3. Age;
  4. Date and Place of Birth;
  5. Gender;
  6. Phone Number;
  7. E-mail Address;
  8. Passport Details;

9. Country of Residence and Citizenship (includes Address, Country, State, Province, ZIP/Postal Code, City).

- Usage Data

  The Company may collect information about how the Client use the Company website, mobile app, products, and services. This includes information such as internet protocol (IP) address, login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices that the Client use to access our website and mobile app and electronic services.

  The Company also obtain number of ways through Client visit of the Company services and website, the time and date of the Client visit, and the time spent on those pages.
- Location Data

  The Company may use and store information about the Client location if the Client give the permission to do so. The Company use this data to provide features of the Company Service, to improve and customize the Company Service.

  The Client can enable or disable location services when use the Company Service at any time by way of the Client device settings.
- Tracking Cookies Data

  The Company use cookies and similar tracking technologies to track the activity on the Company Service and the Company hold certain information. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to the Client browser from a website and stored on the Client device. Other tracking technologies are also used, such as beacons, tags and scripts to collect and track information and to improve and analyze the Company Service.

  The Client can instruct the browser to refuse all cookies or to indicate when a cookie is being sent. However, if the Client do not accept cookies, the Client may not be able to use some portions of the Company Service.

  Examples of cookies that the Company use:

  1. Session Cookies: to operate the Service;

2. Preference Cookies: to remember the preferences and various settings;
3. Security Cookies: for security purposes;
4. Advertising Cookies: to serve advertisements that may be relevant to the Client interests.

- Other Data

  While using the Service, the Company may also collect the following information: Details of documents on education, qualification, professional training, employment agreements, NDA agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) number, office location and other data.

5. Use of Data

The Company uses the collected data for the following purposes:

1. To provide and maintain the Service;
2. To notify about changes to the Service;
3. To allow participation in interactive features of the Service when the Client choose to do so;
4. To provide customer support;
5. To gather analysis or valuable information so that the Company can improve our Service;
6. To monitor the usage of the Service;
7. To detect, prevent, and address technical issues;
8. To fulfil any other purpose for which the Client provide it;
9. To carry out the obligations and enforce the rights arising from any contracts entered into between the Company and the Client, including for billing and collection;
10. To provide the Client with notices about the Client account and/or subscription, including expiration and renewal notices, email instructions, etc.;
11. To provide news, special offers and general information about other goods, services and events which the Company offer that are similar to those that the Client have

already purchased or enquired about, unless the Client have opted not to receive such information;

12. In any other way, the Company may describe when the Client provide the information;
13. For any other purpose with the Client consent.

6. Retention of Data

The Company will retain the Client's Personal Data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy. The Company may retain and use the Client's Personal Data as needed to comply with applicable legal obligations (for example, when retention is required by law), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analytical purposes. Usage Data is typically retained for a shorter period, unless it is required to enhance the security or functionality of our Services, or where longer retention is mandated by law.

7. Transfer of Data

The Client information, including Personal Data, may be transferred to – and maintained on – computers located outside of the Client state, province, country or other governmental jurisdiction where the data protection laws may differ from those of the Client jurisdiction.

By consenting to this Privacy Policy and submitting such information, the Client acknowledges and agrees that their data may be processed by the Company as necessary to operate and provide its services.

The Company will take all reasonable measures to ensure that the Client's data is handled securely and in compliance with applicable data protection standards.

8. Disclosure of Data

The Company may disclose personal information that the Company collect or the Client provide:

1. Disclosure for Law Enforcement.

   Under certain circumstances, the Company may be required to disclose the Client Personal Data if required to do so by law or in response to valid requests by public authorities.

2. Business Transaction.

   If the Company or our subsidiaries are involved in a merger, acquisition or asset sale, the Client Personal Data may be transferred.

3. Additional Cases Where The Company May Disclose The Client Information:

   1. To the Company subsidiaries and affiliates;
   2. To contractors, service providers, and other third parties the Company use to support the business;
   3. To fulfil the purpose for which the Client provide it;
   4. For including the Client company's logo on our website;
   5. For any other purpose disclosed by the Company when the Client provide the information;
   6. With the Client consent in any other cases;
   7. If the Company believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

9. Security of Data

The security of the Client data is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While the Company strive to use commercially acceptable means to protect the Client Personal Data, the Company cannot guarantee its absolute security.

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10. The Client Data Protection Rights

The Company aim to take reasonable steps to allow the Client to correct, amend, delete, or limit the use of the Client Personal Data.

If the Client wish to be informed what Personal Data the Company hold about the Client and if the Client want it to be removed from our systems, please email the Company at **info@orbitrades.com.**

In certain circumstances, the Client have the following data protection rights:

1. The right to access, update, or delete the information the Company have.
2. The right of rectification if that information is inaccurate or incomplete.
3. The right to object our processing of the Client Personal Data.
4. The right to restrict the processing of the Client personal information.
5. The right to be provided with a copy of the Client Personal Data in a structured, machine-readable and commonly used format.
6. The right to withdraw the Client consent at any time, where the Company rely on the Client consent to process the Client personal information.

Please note that the Company may ask the Client to verify the Client identity before responding to such requests. Please note that the Company may not be able to provide the Service without some necessary data.

The Client have the right to complain to a Data Protection Authority about our collection and use of the Client Personal Data.

11. Service Providers

The Company may employ third-party companies and individuals to facilitate the Service ("Service Providers"), provide Service on the Company behalf, perform Service-related services or assist the Company in analyzing how the Service is used.

These third parties have access to the Client Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

12. Analytics

The Company may use third-party Service Providers to monitor and analyze the use of the Service.

13. CI/CD tools

The Company may use third-party Service Providers to automate the development process of the Service.

14. Behavioral Remarketing

The Company may use remarketing services to advertise on third-party website to the Client after the Client visit the Service. The Company and the third-party vendors use cookies to inform, optimize and serve ads based on the Client past visits to the Service.

15. Payments

The Company may provide paid products and/or services within the Service. In that case, the Company use third-party services for payment processing (e.g., payment processors). The Company will not store or collect the Client payment card details. That information is provided directly to our third-party payment processors whose use of the Client personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

16. Links to Other Sites

the Service may contain links to third-party websites that are not operated by the Company. If the Client click a third-party link, the Client will be directed to that third party's website. The Company strongly encourage the Client to review the Privacy Policy of every site the Client visit. Please note that the Company have no control over, and assume no responsibility for the content, privacy practices, or policies of any third-party sites or services.

17. Children's Privacy

Our Services are not directed to, and are not intended for use by, individuals under the age of 18 ("Children"). The Company do not knowingly collect personally identifiable information from Children under 18. If the Company become aware that the Company have inadvertently collected Personal Data from a Child without appropriate parental or legal guardian consent, the Company will take immediate steps to delete such information from the Company records. If the Client believe that a Child has provided us with Personal Data, the Client are urged to contact us promptly so that the Company may take appropriate action.

18. Changes to This Privacy Policy

The Company may update the Privacy Policy from time to time. The Company will notify the Client of any changes by posting the new Privacy Policy on this page. The Company will let the Client know via email and/or a prominent notice on our Service, prior to the change becoming effective and update "effective date" at the top of this Privacy Policy. The Client are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

19. Trading Rules

By using this application, the Client acknowledge that the Client have read and agreed to our Trading Rules. The Client may review the Trading Rules at the following link:

Trading Rules

20. Contact Us

If the Client have any questions regarding this Privacy Policy, please contact us by email:

info@orbitrades.com

+1 (737) 232-2299

+62 8111 717 999 (Bahasa)

Part 2: CONFIDENTIALITY POLICY

1. Applicable Regulatory Framework and Purpose of This Policy

This Policy establishes the framework for safeguarding the confidentiality of non-public consumer information handled by the Company, its employees, and authorized agents. It governs the processes by which consumer data—pertaining to both current and prospective clients engaged with the Company's products or services—is collected, stored, used, and protected.

The Company hereby commits to maintaining strict confidentiality of all consumer data and prohibits disclosure thereof to any unauthorized third parties. Use of consumer information shall be strictly limited to purposes expressly consented to by the consumer or as mandated by applicable law.

This Policy is intended to operate in conjunction with, and not supersede, the Company's existing Privacy Policy and related contractual agreements, which comprehensively describe the collection, processing, transfer, and protection of personal data. These documents also outline the rights of consumers with respect to their personal information during and subsequent to their relationship with the Company. The current version of the Privacy Policy is accessible on the Company's official website.

2. Non-Public Data Collected and Processed

A list of non-public data collected and processed by the Company includes, but is not limited to:

- Personal data
  1. Name;
  2. Surname;
  3. Date of Birth;
  4. Gender;

5. Phone Number;
6. E-mail Address;
7. Country of Residence and Citizenship (includes Address, Country, State, Province, ZIP/Postal Code, City);
8. Occupation and Employment Details.

- Information for the construction of the client's economic profile, including source of income and wealth, and details about the source of funds
- Information on whether a client holds a prominent public function (PEPs)
- Bank Account and/or Credit card details and/or other payment details
- Documents provided to the Company for verification of the client's identity, i.e. passport/identity card, utility bills and other identifiable documents of clients who are physical persons
- Documents provided to the Company for verification of identity of clients who are legal entities, such as the legal entity's incorporation documents as applicable, financial statements, business plan, passport/ID, utility bills and other identifiable documents of directors, shareholders and authorized persons of the legal entity for verification purposes
- Any other information designated as confidential

3. Sensitive Data Collected and/or Processed

The Company considers the following Personal Data to be "sensitive":

- Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs
- Trade-union membership
- Genetic data, biometric data processed solely to identify a human being
- Health-related data
- Data concerning a person's sex life or sexual orientation

The Company does not customarily collect and/or process sensitive data from clients or potential clients during the provision of the services. Where the Company will ask the Client for sensitive Personal Data, it will always tell the Client why and how the information will be used.

4. The Purpose for Which Non-Public Consumer Data is Collected and Used

The non-public consumer data collected by the Company is used in all stages of its business relationship with consumers to be able to provide the services and products based on the client services agreement and business relationship with the clients. In other words, the Company needs to collect the data explained above for the performance of its contractual obligations towards clients. In addition, processing of Personal Data takes place to be able to complete our client due diligence and onboarding process, as well as to ensure the provision of high-quality services to our clients.

The Company is subject to several laws and regulations, including anti-money laundering laws and financial services laws, while it is under the supervision of competent authorities such as the Financial Services Authority in Seychelles, whose laws, regulations and circulars apply to the Company. For this purpose, the Company is required to comply and collect certain data during the client onboarding and ongoing monitoring of clients, as well as transactions and/or request information from clients for risk mitigation/management reasons.

At the beginning of the Company's consumer relationship, non-public consumer data, such as, without limitation, full name, address and telephone number, is required by the Company to authenticate/verify the identity of a client. Identifying the true identity of a client is of crucial importance for the Company, as it enables the Company to identify, assess, mitigate, prevent and investigate possible fraudulent activity.

In the course of the Company's consumer relationship, non-public consumer data, such as, without limitation, the risk aversion, income and profession of a client, are required by the Company to assess the appropriateness of the products and services it provides to consumers. In addition, using the consumer's data, the company is able to manage the client's account and/or inform the client about any products or services that may be of his/her interest. Apart from the aforesaid, the data can be used by the Company for statistical purposes to improve its products and services, as well as to update clients on any issues that might arise regarding their business relationship with the Company.

Lastly, non-public consumer data is necessary at the stage at which a client decides to terminate its relationship with the Company. In this stage, non-public consumer data might be used for the purpose of resolving and/or assessing the history of a client's complaint. It is noted that non-public consumer data is kept by the Company for a period of 7 years from the date of the client's last transaction with the Company, in line with AML and the requirements of our Regulatory Authority.

5. Security Practices and Procedures to Safeguard Non-Public Consumer Data

The Company implements the required procedures for safeguarding the security, integrity, and confidentiality of information, considering the nature of the information to be stored.

Agents or third parties that assist the Company to provide its services to clients shall maintain the confidentiality of non-public consumer data and use such information only in the course of providing their services, based on the Company's directions.

The Company monitors the activities of agents and third parties acting on its behalf on the basis of the relevant agreements that are in place for each business relationship.

The security of non-public consumer data is of utmost importance for the Company. For this reason, the Company implements a number of procedures for the accessibility and protection of data.

Specifically, non-public consumer data is only accessible by employees who need the specific information in order to operate, develop or improve the Company's services. Such individuals are bound by confidentiality and are subject to internal disciplinary procedures in case they fail to meet their obligations.

The accessibility of non-public consumer information by employees is based on the following principles:

1. Differentiation of the access rights depending on job responsibilities.
2. Protect systems using technical measures at the network, system and application levels, as well as organisational measures.
3. Responsibility measures for the illegal rendering of the information to the employees of the Company and by individuals outside the Company.
4. Ensure confidentiality of information by using data encryption and access control.

6. Collection of Non-Public Consumer Data

a. Processing of Data

The processing of non-public consumer data is carried out through the information processing systems used by the Company. The data collected from consumers is only processed and analysed by the employees of the Company, and by persons who have the required authority and rights to use such data. The Company treats unauthorized access to data by employees as a serious violation of the Company's internal policies and procedures. To this end, any unauthorized access to non-public consumer data by employees is subject to disciplinary procedures, without prior notice.

The Client can request from the Company to restrict and/or terminate the processing of his/her Personal Data at any time, and the Company shall duly consider such request based on the applicable laws and regulations.

b. Data Protection Officer

In accordance with local regulations, the Company has appointed a Data Protection Officer who will, among other duties:

- Monitoring compliance with the policies on the protection of Personal Data and compliance with the Data Protection Laws.
- Act as the contact point for the Commission on issues relating to processing, including consultation, investigations, audits or any other aspect that the Commission deems necessary in relation to the data protection laws.
- Act as the main focal point for the data subject's complaints, and shall be responsible for establishing adequate mechanisms for handling disputes.

c. **Intended Recipients**

The intended recipients of non-public consumer data shall be the employees of the Company, persons who possess the required rights and authority to access such data. In addition, any agent or third parties acting on behalf of the Company should be considered as intended recipients of the data only in case such data is required in the course of providing their services, based on their agreement with the Company.

d. **Non-Public Consumer Data Rights**

The Client may exercise the following rights in relation to the non-public data held by the Company by submitting a request via email to info@orbitrades.com:

- Right to review

  Every financial consumer has the right to review his/her non-public consumer data stored by the Company, upon request to the Company.

- Right to correct or amend

  Every financial consumer has the right to correct or amend his/her non-public consumer data stored by the Company, upon request to the Company.

7. Storage of Non-Public Consumer Data

The Company undertakes all reasonable and appropriate organisational, physical and technical measures for the protection of non-public consumer data against unlawful access, destruction, misuse or accidental loss.

Non-public consumer data are being stored on the various databases of the Company located on the Company's server and cloud. For the purpose of protecting the stored data, the Company implements the procedures analysed in *Section 6* of this manual.

For safeguarding the Company's recorded data from possible loss, the Company implements consistent, reliable and documented backup procedures. The backup procedure is automatic and takes place in different ways and frequencies depending on the criticality level of the relevant business application system.

The Company keeps the client's non-public consumer data on record for a period of seven (7) years from the date of the last transaction of the client with the Company. In case there is an investigation against any customers, the documents will be kept according to the instructions of the investigating authority.

The Company will be able to retrieve the relevant documents/data without undue delay and present them at any time to the local authorities if requested.

8. Disclosure of Non-Public Consumer Data

The Company may disclose non-public consumer data to a third party in the following circumstances:

1. If the client has been informed about the disclosure and he/she has consented in writing to the disclosure.
2. If the third party to which the data will be disclosed has been authorized by the client to obtain the data from the Company.
3. If the Company is required to disclose the non-public consumer data under mandated Credit Reporting or under any other law or by a court order.

Voluntary Disclosure

Apart from the above circumstances, the Company might disclose the consumer's non-public data to third parties, on the basis that the consumer has voluntarily consented to this Policy, as described in *Section 10* below.

9. Client Consent

At the stage of establishing a business relationship with the Client, the Company obtains the Client's voluntary consent to this policy. Such consent is obtained before the offering of any services to the Client.

The Company may obtain the Client's consent electronically in the form of a general agreement through the acceptance of the client services agreement, and/or consider clients who have received and agreed to this policy electronically as clients who have given their consent to the disclosure of their non-public consumer data.

10. Amendment to The Policy

The Company reserves the right to make changes to this Confidentiality Policy from time to time for any reason, and the Client will be notified of such changes by posting an updated version of this Confidentiality Policy on the website. The client is responsible for regularly reviewing this Confidentiality Policy and the use of this website after any such changes are published, which shall constitute an agreement to such changes.

11. How to Contact Us

The Client can extend any questions or requests he/she might have in relation to his/her data stored by the Company by sending an email to info@orbitrades.com.