

## **Our Commitment**

Privacy is of utmost importance at Grow Wealth Investment. We recognize the significance of protecting information which is stored on our servers or network or is intended to be stored on our servers or network and which relates to an individual. The data we protect are the "Personal Data" which is any information relating to an identified or identifiable natural person, sometimes called a data subject, and have made protecting the privacy and the confidentiality of Personal Data a fundamental component of the way we do business.

This Privacy Policy informs you of the ways we work to ensure privacy and the confidentiality of Personal Data and describes the information we gather, how we use those Personal Data and the circumstances under which we disclose such information to third-parties.

## **Regulatory Compliance**

This Privacy Policy is designed to address regulatory requirements of the jurisdictions in which Grow Wealth Investment offers its Services, including the General Data

Protection Regulation ("GDPR"), as enacted by the European Commission. In this Privacy Policy, the term "Service" and "Services" has the same meaning as described in the User Agreement.

If you do not agree with this Privacy Policy, in general, or any part of it, you should not use the Services. This Privacy Policy is periodically reviewed to ensure that any new obligations and changes to our business model are taken into consideration. We may amend this Privacy Policy at any time by posting an amended version on our website.

Our Services are offered through one or more subsidiaries of Grow Wealth Investment. By using the Services, you understand that your Personal Data may be used by Grow Wealth Investment.

### **Collection of Personal Data**

When you access or use the Services, we collect the following information:

### **Information You May Provide to Us**

You may give us information about you by filling in forms on our website or through our app or by corresponding

with us by phone, email or otherwise. This includes information you provide when you register to use the Services and when you report a problem with the website.

### **Information We Collect About You**

With regard to each of your visits to our website, we automatically collect the following information:

- **Login Information:** We log technical information about your use of the Services, including the type of browser and version you use, the last access time of your account, the Internet Protocol (IP) address used to create the account and the most recent IP address used to access the account.
- **Device Information:** We collect information about the device you use to access your account, including the hardware model, operating system and version, and unique device identifiers, but this information is anonymous and not tied to any particular person.
- **Transaction Information:** In connection with our Conversion Service, as such term is defined in our User Agreement, we may collect and maintain

information relating to transactions you effect in your account.

## **Information We Collect Required By Law, Rule, or Regulation**

Depending on the Service, we may collect information from you in order to meet regulatory obligations around know-your-customer ("KYC") and anti-money laundering ("AML") requirements. Information that we collect from you includes the following:

- Full name
- Residential address
- Contact details (telephone number, email address)
- Date and place of birth, gender, place of citizenship
- Your status as a politically exposed person
- Source of funds & proof of address
- Passport and/or national driver's license or government-issued identification card to verify your identity

- Transaction history and account balances in connection with your use of certain Services

## **Disclosure of Personal Data**

We may share your information with selected recipients to perform functions required to provide certain Services to you.

We also may share Personal Data with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Grow Wealth Investment' assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Data held by Grow Wealth Investment is among the assets transferred.

Except where we are required by law to disclose Personal Data, or are exempted from, released from or not subject to any legal requirement concerning the disclosure of Personal Data, we will require any person to whom we provide your Personal Data to agree to comply with our Privacy Policy in force at that time or requirements substantially similar to such policy. We will make

reasonable commercial efforts to ensure that they comply with such policy or requirements, however, where not expressly prohibited by law, we will have no liability to you, if any person fails to do so.

We shall require any third-party, including without limitation, any government or enforcement entity, seeking access to the data we hold to a court order, or equivalent proof that they are statutorily authorized to access your data and that their request is valid and within their statutory or regulatory power.

### **Security of Your Personal Data**

We protect Personal Data with appropriate physical, technological and organizational safeguards and security measures. Your Personal Data comes to us via the internet which chooses its own routes and means, whereby information is conveyed from location to location. We audit our procedures and security measures regularly to ensure they are being properly administered and remain effective and appropriate.

Every member of Grow Wealth Investment is committed to our privacy policies and procedures to safeguard Personal

Data. Our site has security measures in place to protect against the loss, misuse and unauthorized alteration of the information under our control. More specifically, our server uses TLS (Transport Layer Security) security protection by encrypting your Personal Data to prevent individuals from accessing such Personal Data as it travels over the internet.

## **Your Rights**

The rights that are available to you in relation to the Personal Data we hold about you are outlined below:

### **Information Access**

If you ask us, we will confirm whether we are processing your Personal Data and, if so, what information we process and, if requested, provide you with a copy of that information within 30 days from the date of your request.

### **Erasure**

You can ask us to delete or remove your Personal Data in certain circumstances such as if we no longer need it, provided that we have no legal or regulatory obligation to retain that data. Such requests will be subject to any

agreements that you have entered into with us, and to any retention limits, we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your Personal Data to others, we will let them know about the erasure request where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your Personal Data so that you can contact them directly.

### **Processing Restrictions**

You can ask us to block or suppress the processing of your Personal Data in certain circumstances, such as, if you contest the accuracy of that Personal Data or object to us processing it. It will not stop us from storing your Personal Data. We will inform you before we decide not to agree with any requested restriction. If we have disclosed your Personal Data to others, we will let them know about the restriction of processing where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your Personal Data so that you can contact them directly.

By using the Services, you signify your agreement to this Privacy Policy. Grow Wealth Investment reserves the right to change or amend this Privacy Policy at any time. If we make any material changes to this Privacy Policy, the revised Policy will be posted here and we will notify our users at least 30 days prior to the changes taking effect so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it. Please check this page frequently to see any updates or changes to this Privacy Policy.