

# WOXA LIMITED PRIVACY POLICY



WOXA.COM is operated by WOXALTD, which is regulated by the Financial Services Commission of the Republic of Mauritius (License) (FSC) with an Investment Dealer License with license number GB22200605 with registered address at Hotel Avenue C/o JurisTax Ltd, Ebene House 33 Cybercity, Ebene, 72201 MAURITIUS

# WOXA LIMITED PRIVACY POLICY

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As part of our daily business operations, WOXALIMITED needs to collect personal data from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services as well as when providing them with the respective data.

Protecting client's privacy and personal and financial data is one of our top priorities for WOXALIMITED This Privacy Policy sets out how WOXALIMITED (the "Company" or "Woxa") collects, uses and manages client personal data we receive by client or a third party in connection with our provision of services to client or which we collect from client's use of our services and/or our website (<https://www.woxa.com>) and/or any other related websites and applications including, among others, the Company's Members Area. The Privacy Policy also informs clients of their rights with respect to the processing of their personal data.

This Privacy Policy applies to the processing activities performed by WOXALIMITED to the personal data of its clients/potential clients, the website, use of cookies, contract and communication and email newsletter.

## 1. What is this Privacy Policy for?

This privacy policy is for this website and governs the privacy of its users who choose to use it. The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

## 2. Collecting personal data

By registering a Personal Area, client agree to have their personal data processed and specifically consent to the collection, systemization, aggregation, storage, revision (updating, changing), usage, anonymization, blocking, deletion, and distribution (transfer) of said personal data to third parties in accordance with the conditions set forth in this Privacy Agreement. The Company shall ask the client for the data necessary for registering a Personal Area, providing functional service, and using this data if a dispute arises between client and WOXALIMITED Providing this data is required for client identification and thus allows clients to perform various operations in their Personal Area and trading accounts. The Company may also collect data to improve our understanding of their needs and preferences by communicating through Live Chat, conducting brief surveys in their Personal Area on our official website, and communicating with clients over the phone.

Clients provide this data to us voluntarily. The Company uses the data that clients directly provide when communicating.

If you provide personal data of third parties, such as family members, emergency contacts, or reference persons, please inform such persons of the information described in this Privacy Policy. Also, in some cases, you may need to obtain consent from the individuals in order for us to process their personal data.

In the event that the Company requires to process the client's personal data for purposes beyond those initially specified, the Company shall inform the client accordingly. If such additional processing cannot be justified by any other legal bases, the Company shall seek the client's explicit consent before proceeding with the processing of personal data for the new purpose. The client will have the option to provide or withhold consent based on their preferences.

### **3. Use of personal data**

The Company uses client's personal data to provide secure high-quality service. The personal data clients provide us with is used to verify contact information and identity. The Company also uses personal data to register Personal Areas, open and configure trading accounts, and issue activation codes and passwords. By providing contact information, clients help us improve our services and promptly communicate the availability of additional services, features, and promotions we may be offering.

### **4. Providing personal data to third parties**

In some circumstances, the Company may be required to disclose and/or transfer client's personal data to third - party organizations. The Company shall process and transfer the client's personal data to third parties strictly in accordance with the purpose and scope for which it was collected, and shall adhere to the principle of data minimization. Personal data will only be shared with third parties when necessary to fulfill the intended purpose . The Company ensures that only the minimum amount of personal data required for the specific purpose is disclosed to third parties.

In some circumstances, the Company may be required to disclose and/or transfer client's personal data to third - party organizations. In order for third-party organizations to process personal data as part of their responsibilities under contract with the Company or legal obligations, the Company may be required to disclose or transfer client's personal data to third-party organizations. The Company shall reserve the right to provide personal data to third parties if required by law or if we receive formal requests from law enforcement and other government agencies. The Company may also provide clients' 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. The Company may pass client's personal data on to third party authentication service providers when clients use our system to perform identity checks and documents verification - Woxa do this in order to comply with our legal obligations. For the cases where personal data are being disclosed or transferred to third-party organizations, the Company shall ensure that the minimum amount of personal data are being disclosed or transferred, the Company shall maintain the confidentiality and security of the data being transferred. Besides, the Company may consider anonymization and pseudonymization techniques for greater security. The third-party organizations who will process client's personal data for the Company will be required to have in place an appropriate privacy policy. The Company does not permit these third-party organizations to use client's personal data in a way that diverge from the agreed scope and purposes.

In order to give clients comprehensive, state-of-the-art high-quality service, the Company may exchange client's personal data with our partners. However, the use of client's personal data is limited to sharing the client's account number with one of our partners at their request. At client's request, Woxa can provide information about the services that our partners provide for us.

The Company shares personal data with third parties for the purpose of improving its services, business development, and marketing initiatives. This includes but is not limited to collaborating with service providers, partners, and marketing agencies to enhance the overall client experience, provide personalized services, and develop targeted marketing campaigns. Personal data shared with third parties will be used solely for the purpose of achieving these objectives and will be handled in accordance with applicable data protection laws and regulations.

## 5. Logging in via Facebook

### 5.1 Data and purpose of collecting

WOXA LIMITED requests only Email from Facebook to be used as a username for registration and login.

If you want to disconnect (Unsync) via Facebook, you can do it by going to "Settings", select "Connect via Social" and select "Disconnect". However, it will still be retained for direct web logins, but will not be able to log in via Facebook account. If you want to log in via Facebook, you will need to reconnect.

### 5.2 Submission of Personal Data deletion request

Users can delete their Personal Data completely by requesting to delete their accounts.

Here is how to delete the trading account on WOXA;

#### 5.2.1 Delete trading account on WOXA

Go to "Settings", select "Close your WOXA account".

## 6.The Website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience.

## 7.Use of Cookies

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer/device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer/device.

Cookies are small files saved to the user's computer's hard drive that track, save and store data about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive, they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to clients' computer's hard drive—in order to track and monitor client's engagement and usage of the website, but will not store, save or collect personal data.

Other cookies may be stored to clients' computer's hard drives by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal data is stored, saved or collected.

## 8.Contact & Communication

Users contacting this website and/or its owners (support@woxa.com) do so at their own discretion and provide any such personal details requested at their own risk. Client's personal data is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 2017. Every effort has been made to ensure a safe and secure form to email submission process but advise users using such form to email processes that they do so at their own risk. This website and its owners use any information submitted to provide clients with further information about the products/services they offer or to assist clients in answering any questions or queries clients may have submitted. This includes using client details to



subscribe clients to any email newsletter program the website operates but only if this was made clear to clients and client's express permission was granted when submitting any form to the email process. Or whereby clients the consumer have previously purchased from or enquired about purchasing from the company a product or service that the email newsletter relates to. This is by no means an entire list of clients' user rights with regards to receiving email marketing material. Client's details are not passed on to any third parties.

## 9. Email Newsletter

This website operates an email newsletter program, used to inform subscribers about products and services supplied by this website. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

## 10. Your Rights as Data Subject

Users may have certain rights and protection under the Data Protection Act 2017 which users can exercise freely, as per below:

10.1 Right to withdraw consent at any time – users have the legal right to change their mind and withdraw their consent at any time for the case where the Company has obtained your consent to process your personal data. However, this will not affect the lawfulness of processing based on consent before its withdrawal;

10.2 Right to access to personal data – users have the right to request access to the personal data we hold to check whether or not users' personal data is being processed, and if it is, users can request details about that processing. Further, users may request a copy of their personal data undergoing processing. Please note that the Company may need to verify your identity before fulfilling such requests to secure your privacy and security;

10.3 Right to rectification of personal data – users have the right to request for rectification of any inaccurate or incorrect personal data we hold about users. Users may update or correct their personal data in order to keep them correct and concurrent to the present;

10.4 Right to restriction of personal data – users have the right to request the restriction of their personal data processing according to these following circumstances:

- during the verification of users' requests to rectify their personal data,
- when personal data were to be deleted or destroyed, but was followed by users' request for processing restriction instead,

- when the processing terms have expired, but users have requested processing restrictions in order to establish legal claims, be compliance with, exercise or object to legal claims, and
- during verification of users' request to object to the processing;

10.5 Right to erasure of personal data – users have the right to request personal data deletion or anonymization according to the following cases:

- when the processing of personal data is no longer necessary,
- when consent has been withheld, and the Company cannot rely on other legal basis to process users' personal data,
- when there is an objection raised against the processing, and
- when users' personal data have been processed in an unlawful manner; and

10.6 Right to lodge a complaint with the Commissioner – users may exercise their right to lodge a complaint with the Data Protection Commissioner

In the event where you intend to exercise your rights, or to lodge a complaint against your personal data processing, please contact the Company's website and/or its owners with the contact details as outlined in this Privacy Policy.

## 11. Automated decision-making

At WOXALIMITED, we may utilize automated processes to enhance our service (e.g. automatic profiling). In any case, the Company made a decision that would significantly affect the client based solely on the automated process. The client may request human intervention and not be subject to such automated decision-making unless it is necessary for the performance of the contract. Further, the client shall retain their right to contest the automated decisions to be reevaluated. The Company ensures that the decision made by the automatic system shall not violate and comply with relevant laws and regulations.

## 12.Retention period

WOXALIMITED will retain your personal data for as long as it is deemed necessary to fulfill the purposes we collected it for, including performing other necessary operations such as legal, regulatory, accounting, auditing activities, taxation, or reporting requirements. The Company will preserve your personal data on the secure server with appropriate procedures to ensure your security.

When WOXALTD. deem that your personal data is no longer necessary for the purposes we collected it for, WOXALIMITED will remove any details that will identify you or we will securely destroy the records. However, the

Company may need to maintain certain data and records for a significant period of time in accordance with the relevant laws and regulations after our business relationship with you has ended. For example, as per Section 17F of the FIAMLA, the Company is committed to maintaining record not less than seven (7) years after the business relationship has ended.

### **13. Transfer to another country**

When using our services, WOXALIMITED may be required to pass on personal data to data recipients in foreign countries. The Company shall process and store your personal data in accordance with the scope and processing purposes specified in this Privacy Policy within Mauritius and other countries, including Thailand. The Company transfers your data to, or store or access, it in jurisdictions that may not provide levels of data protection equivalent to your home jurisdiction. The Company attest that we will provide appropriate data protection safeguards in compliance with the regulations of the destination country.

### **14. Personal data breach**

The Company has implemented certain security measures to ensure the security of your personal data and will notify you and relevant regulators in the case personal data breach occurs, where we are legally required to do so.

### **15. Privacy Policy revision**

This Privacy Policy applies to our website. The Company reserves the right to amend, revise, modify, change, or terminate the Policy at its sole discretion. Any changes or updates of the Policy shall be effective immediately upon posting on the Company's website. In the event where WOXALIMITED modify any term regarding collection of personal data, purpose for which the personal data are to be processed, recipient to whom WOXALIMITED intends or may wish to disclose the personal data, or security measure, such revision shall be notified to all related parties under this Privacy Policy.