



## PRIVACY POLICY



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## Privacy Policy

### Introduction

In the course of our daily business operations, it becomes necessary for us to gather personal information from both our clients and potential clients. This information enables us to deliver our products and services effectively, tailoring them to individual needs, while also providing relevant information as required.

We hold your privacy in the highest regard, and our policy revolves around safeguarding and respecting the confidentiality of both information and individual privacy. This Privacy Policy delineates the procedures by which ABET GLOBAL Limited acquires, employs, and manages personal information. This information is garnered from you directly, a third party on your behalf, or through your interaction with our services, website ([www.Abetglobal.com](http://www.Abetglobal.com)), and related platforms, including the Company's Members Area. Additionally, the Privacy Policy outlines your entitlements concerning the processing of your data.

We routinely review our Privacy Policy to ensure its alignment with new obligations, technological advancements, changes in business practices, and adherence to evolving regulatory landscapes. The most recent iteration of our Privacy Policy will govern any personal information in our possession.

Kindly take note that if you are a current/former employee of the Company, a job applicant, a contractor, or a third-party service provider, your data is used by the terms of your employment or contractual relationship. Our Privacy Policy covers how ABET Global handles data processing for clients, potential clients, website visitors, and employees. Please be aware that this Privacy Policy does not extend to websites managed by external entities or third parties.

### About Us

**Abet Global is duly registered in Anguilla under Registration Number A000000977, with its headquarters located at 9 Cassius Webster Building, Grace Complex, P.O. Box 1330, The Valley, AI-2640 Anguilla.**

**ABET Global Limited operates as a part of the ABET LLC consortium, where each entity within ABET LLC upholds its distinct Privacy Policy. These entities maintain their websites, and if you wish to understand how they handle your data, kindly refer to their respective privacy statements accessible on their websites.**

### Upholding Information Confidentiality and Preserving Privacy

The Company extends its respect for privacy to all users who engage with its website(s), vowing to take reasonable measures to safeguard the interests of existing or prospective clients, applicants, and website visitors.

In alignment with applicable data protection laws and regulations, the Company adheres to the proper storage of personal data belonging to clients and potential clients.

We have implemented comprehensive technical and organizational measures to guarantee the continuous security of your data. Regular training sessions ensure our employees understand the importance of upholding and respecting your personal information and privacy.

Instances of privacy breaches are treated with the utmost seriousness, and appropriate disciplinary actions, including dismissal, are taken when necessary. The personal information you furnish during your registration on the Company's website or for its services is categorized as registered information and is fortified through various protective measures. Access to your registered information in the Members Area is granted via a personal username and password, which you should ensure remains confidential. This data is securely stored, accessible only to authorized personnel through authenticated credentials. All personal information transferred to the Company is protected by a secure 128-bit SSL connection, thwarting unauthorized access attempts. Non-registered personal data is similarly held in secure storage, accessible solely to authorized personnel via designated login details.

Although internet data transmission isn't always foolproof, the Company takes significant precautions to safeguard your data. Upon receiving your information, we enforce stringent procedures and security protocols to mitigate unauthorized access risks.

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## What Data Do We Gather?

To initiate an account with us, you are required to complete an application form providing the necessary details. This data aids the Company in evaluating your application and adhering to relevant regulations. Moreover, the information aids in informing you about our services.

### The data collected may include:

- I. Full name, residential address, and contact details (email, phone, fax).
  - II. Date of birth, place of birth, gender, citizenship.
  - III. Financial details: income, wealth, source of funds, bank information, trading records.
  - IV. Account balances, trading activity, inquiries, and responses.
  - V. Details regarding prominent public functions (PEPs).
  - VI. Professional and employment particulars.
  - VII. Authentication data (e.g., signature).
  - VIII. Location information.
  - IX. Trading performance and experience.
  - X. Verification details: passport, driver's license, identification numbers.
  - XI. Information to identify you and enhance your trading experience.
  - XII. Website activity and movement.
  - XIII. This data is gathered through various channels, such as websites, apps, demo sign-ups, webinars, and customer service communications. Third-party sources may also provide relevant information. Your trading behavior, including product preferences and trading history, is maintained.
  - XIV. Trade products and performance.
  - XV. Historical investment data.
  - XVI. Product and service preferences.
  - XVII. Occasional collection of personal information (e.g., surveys).
  - XVIII. Non-provision of requested information might hinder product/service fulfillment.
  - XIX. Communications (phone, electronic, in-person) may be recorded for evidence.
  - XX. CCTV recordings might be present at our premises.
  - XXI. Unsolicited personal information is securely discarded if unnecessary for our services.
- Feel free to reach out to us if you need further assistance.

### Job Applicant:

For job applicants, personal information is meticulously stored within the Company's personnel records and Human Resources systems. Exclusive non-disclosure agreements tailored for employees are provided upon recruitment.

The Company may hold various types of data relevant to individuals, including:

- I. Contact details (name, address, phone numbers, email), date of birth, gender, and marital status.
- II. Comprehensive resumes and recruitment-related details.
- III. References from previous employers.
- IV. National Insurance numbers.
- V. Information regarding criminal convictions.
- VI. Designations, job particulars, and salary grades.
- VII. Documentation of conduct matters such as concern letters and disciplinary actions.
- VIII. Internal performance records.
- IX. Medical or health history.
- X. Tax codes.
- XI. Terms and conditions of employment.
- XII. Training particulars.
- XIII. Additional personal details may be requested as necessary for recruitment purposes.
- XIV. In cases of unsuccessful employment applications, your consent may be sought to retain your data for potential future vacancies within the Company. Your decision to withhold this consent will not carry any adverse consequences.
- XV. Legal Grounds for Processing and Processing Objectives
- XVI. Your data may be processed based on the following legal grounds and for the subsequent objectives:

## 1. Contractual Obligations and Client Onboarding

We process personal data to fulfill our service and product commitments under the terms of our contracts with clients. This includes sharing information about our offerings and performing necessary identity verification and client acceptance procedures. As part of this process, we need to validate your identity to initiate our client relationship. This enables us to manage your trading account effectively, ensuring optimal service. These actions are mandated by Know Your Customer and Customer Due Diligence regulations.

## 2. Adhering to Legal Requirements

Our operations are subject to various legal and regulatory obligations, encompassing anti-money laundering, financial services, and corporation, privacy, and tax laws. We also comply with supervisory authorities such as the SVG. To meet these requirements, we engage in personal data processing activities for purposes such as credit assessments, identity validation, payment processing, court order compliance, tax reporting, and anti-money laundering protocols. These obligations arise during client onboarding, payments, and systemic risk assessments.

## 3. Protecting Legitimate Interests

We process personal data to safeguard our or third-party legitimate interests, ensuring business and commercial viability without compromising ethical considerations. This processing aligns with a valid business or commercial rationale while respecting your rights and interests. Examples include:

### I. Initiating and defending legal claims;

II. Enhancing IT and system security, crime prevention, asset protection, access controls, and anti-trespassing measures;

III. Implementing CCTV systems for premises security;

IV. Enhancing business operations and innovating products and services;

V. Sharing personal data within ABET GLOBAL Group for anti-money laundering compliance;

VI. Managing risks effectively.

## 4. Consent-Based Processing

We may process your data based on your consent unless otherwise indicated in this policy. You retain the right to revoke consent, with any prior processing remaining unaffected.

## 5. Assessing Service Suitability

To assess the appropriateness of our services/products for the Clients

## 6. Delivering Ongoing Products and Services

Upon successful account creation or subscribing to updates or webinars, we utilize your personal information to fulfill our service obligations and meet your needs. Continuously striving for excellence, we periodically assess your requirements to ensure our offerings remain beneficial to you.

## 7. Enhancing Services and Innovation

We may employ the personal information you provide or survey responses to refine our products and services. This aligns with our commitment to deliver outstanding quality and maintain a leading position in the financial services sector. Visitor behavior on our website is tracked to offer efficient support, ensuring a seamless experience.

## 8. Profiling for Improvement

Your personal information, furnished through service usage or surveys, may be used to enhance our products and services. This practice aligns with our goal of maintaining industry leadership and providing top-notch financial services. Please note that this data cannot be used to identify you specifically.

## 9. Addressing Inquiries and Disputes

To efficiently address and resolve inquiries or disputes, we may employ personal data collected from you. This serves our legitimate interest in ensuring the timely resolution of issues and disputes.

### **10. Compliance with Legal Mandates and Orders**

We may utilize your personal information to adhere to applicable laws, court orders, judicial processes, or regulatory requirements. This action is not only a fulfillment of legal obligations but is also in line with our legitimate interest.

### **11. Soliciting Surveys for Feedback**

Periodically, we may request your participation in surveys as part of our customer feedback process. Seeking such feedback is in our legitimate interest to maintain exceptional service standards. Occasionally, you might be invited to participate in additional surveys, with your consent guiding the use of collected personal data. Survey responses, whether for customer feedback or other purposes, are anonymized and aggregated before sharing with third parties.

### **12. Data Analysis for Enhancement**

Our web pages and emails might contain data analysis tools like web beacons or pixel tags. These tools allow us to monitor correspondence receipts and user visits. We may anonymize your personal information and combine it with others to derive general patterns, leading to improved products and services. When completely anonymized, a legal basis is not required, and for non-anonymized data, continuous evaluation ensures relevance.

### **13. Marketing Outreach**

Personal information may be processed to deliver marketing communications via email, phone, or agreed forms (including social media campaigns). This keeps you updated on our latest offerings. We base marketing communications on your consent or legitimate interest. No disclosure is made to external parties for direct marketing purposes.

### **14. Internal Operations and Records**

We process your data for internal business, research, and record-keeping objectives. This is aligned with our legitimate interests and legal obligations. Communications related to provided services, products, and our relationship with you are included. Additionally, records are maintained to ensure contractual compliance.

### **15. Legal Notifications**

Legal requirements necessitate notifying you of product, service, or legal changes. We use your personal information to send these notifications, irrespective of your choice regarding direct marketing communications.

### **16. Corporate Restructuring**

In instances of corporate restructuring or acquisition by a third party, your personal information may be employed in associated processes. This can involve sharing information for due diligence or disclosures as per legal agreements. Such usage aligns with our legitimate interests and legal responsibilities.

### **17. Physical Security Measures**

Visiting our premises might lead to your image being captured on our CCTV for security reasons. Recordkeeping of visitor details is also conducted. These actions are undertaken to maintain a secure working environment and align with our legitimate interests.

### **Disclosure of Your Personal Information**

Your personal and confidential information remains safeguarded by the Company, refraining from divulging it to external parties except under specific circumstances:

- a. When mandated by applicable laws, rules, and regulations.
  - b. If there's a public duty necessitating disclosure.
  - c. When legitimate business interests dictate disclosure.
  - d. Upon your request, consent, or to individuals specified in this policy. The Company aims to share such information on a 'need-to-know' basis, following regulatory guidance. In such cases, the third party is informed about the confidential nature of the information.
- In pursuit of the purposes outlined above, the Company may share your data with the following entities:
- I. Members of the ABET GLOBAL Group, including ultimate holding companies and their subsidiaries.

II. Our associates and service providers, are engaged for administrative, financial, legal, tax, compliance, insurance, research, or other purposes.  
III. Business introducers with mutual affiliations.  
IV. Business parties, credit providers, courts, tribunals, and regulatory authorities as required by law.  
V. Payment service providers (PSPs) and banking institutions for deposit/withdrawal issues or investigations.  
VI. Individuals authorized by you.  
VII. When disclosed to business parties such as card processing companies or banks, they may store your information to fulfill their obligations.  
VIII. External organizations handling personal data acknowledge its confidentiality, respect privacy rights, and adhere to relevant data protection laws. Third-party service providers like credit referencing agencies may record searches conducted and assist other companies in their searches. Please note that this Privacy Policy doesn't extend to external third parties acting as data controllers. Their use of your personal information is outside our privacy standards.  
Clients acknowledge and consent to the occasional analysis of collected data for statistical enhancement, gathered via website visits or other means, to enhance business activities.  
Transfers Beyond the European Economic Area (EEA)  
Personal information may be transferred within or outside the European Economic Area to other ABET GLOBAL entities and service providers (Processors).  
For transfers beyond the EEA, we ensure legality and Processor compliance with European data protection laws or comparable laws of other countries. Adequate safeguards are established in line with GDPR Article 46.

#### **Transfers to Processors in the USA**

In specific instances, when transferring data to processors in the USA, we may rely on standard contractual clauses, binding corporate rules, or equivalent safeguarding arrangements that align with applicable regulations.

In light of the above, your data may be processed by ABET GLOBAL staff operating inside or outside the EEA, working for us, other ABET GLOBAL entities, or service providers. These staff members play roles like addressing your requests, managing payment details, and offering support services. Upon submitting your data, you implicitly consent to this transfer, storage, and processing. The Company commits to treating your data securely and in line with this Privacy Policy.

#### **Information Gathered from Your Service Use**

The Company's website(s) utilize tracking systems to collect personal data, optimizing services for clients and potential clients. We collect information using the methods below:

#### **Device Information**

By recognizing your device accessing our website(s), we tailor your experience by providing the most relevant version.

#### **Log Information**

Tracking user actions helps troubleshoot issues by logging certain site behaviors.

##### **Location Information**

Utilizing your IP address, we localize content according to your country, enhancing your site experience.

#### **Cookies**

These text files sent from our site(s) to your browser improve performance and visitor experience, aiding future advertising campaigns.

#### **Local Storage**

Verification documents for activating trading accounts are transmitted over secure connections and stored safely.

#### **Cookies**

Internet cookies, and small data pieces stored on your computer, enhance your experience and may include a unique identifier. This data collection aims to personalize web pages.

To disable cookie acceptance, adjust your browser preferences. Note that disabling cookies may limit access to specific parts of our website(s).

We also use cookies for re-marketing, allowing ads to target users who previously visited our site(s). Third parties like Google and Ad Roll may be involved in these efforts.

### **Consent Acquisition**

Personal data use requires your consent, it's obtained as outlined in our business relationship terms available on our website(s). Withdraw consent anytime by contacting us.

#### **Personal Data Storage and Retention**

Safeguarding your information is paramount. We retain personal data throughout our business relationship, employing secure storage methods to prevent misuse or unauthorized access. When data becomes unnecessary, identifying details are removed, or records are securely destroyed. Certain legal requirements, such as anti-money laundering laws, necessitate data retention.

### **Your Rights Regarding Personal Information**

*You have rights concerning your data:*

#### **Information and Access**

Upon request, we confirm processing and provide a copy of your data within 30 days. Additional copies might incur a fee.

Please exercise these rights by emailing [support@abetglobal.com](mailto:support@abetglobal.com).

#### **Rectification of Personal Information**

Ensuring accuracy is paramount to us. We take reasonable measures to maintain your personal information's accuracy, completeness, and currency. If any of your personal information held by us is incorrect or incomplete, you have the right to request its rectification.

If we've shared your personal information with others, we'll notify them of the rectification whenever possible. Upon request, we'll also inform you about the recipients of your information, enabling direct contact.

To update your details, simply email us at [support@abetglobal.com](mailto:support@abetglobal.com). We'll process changes according to your instructions. In some cases, we might require supporting documents from you, particularly for data we must retain per regulatory or legal mandates.

#### **Erasure of Personal Information**

In specific scenarios, such as no longer needing your data or your withdrawal of consent (if applicable), you can request the deletion or removal of your personal information. However, this request will be subject to retention limits mandated by laws and regulations, as outlined in the 'Storage of Your Personal Information and Retention Period' section.

If your personal information has been shared with others, we'll endeavor to inform them of the erasure. Upon your request, and if possible and lawful, we'll also provide details of the recipients so you can contact them directly.

#### **Processing Restrictions**

Under certain circumstances, like contesting the accuracy of your data or objecting to its processing, you can ask us to restrict its processing. However, this won't hinder us from storing the data.

We'll notify you before declining any requested restriction. If your data has been shared with others, we'll communicate the restriction if feasible. Upon your request, and if possible and lawful, we'll also provide information about recipients for direct contact.

#### **Data Portability**

As per the General Data Protection Regulation (679/2016), you hold the right, in specific situations, to obtain your provided personal information (in a structured, machine-readable format) for reuse elsewhere or to transfer it to a chosen third party.

#### **Objection to Processing**

You can request the cessation of processing your personal information in various scenarios:

1. When relying on our or others' legitimate interests, unless compelling legal grounds justify the processing.
2. For direct marketing purposes.
3. For research, unless deemed necessary for a public interest task (such as regulatory enforcement).

### **Automated Decision-Making and Profiling**

If a decision about you is solely based on automated processing, impacting your service use or other significant aspects, you can request not to be subject to such decisions. However, if such decisions are necessary for a contract between us, you may request human intervention. Please note that opting for this may lead to the termination of our relationship

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