

Topline Limited

Regulated by the Financial Services Authority Seychelles

PRIVACY POLICY

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1. Introduction

Topline Limited (hereinafter called the “Company”) is authorized and regulated by the Financial Services Authority Seychelles (FSA) under Securities Dealer License number SD106. The authority is the regulator for non-bank financial services in the country and is responsible for the licensing, supervision and development of the non-bank financial services industry of the Seychelles.

2. Scope of the Privacy Policy

Through this privacy policy, your data may be called either “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing” such personal data.

For the purposes of this statement, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address and identification number.

To fully understand the changes and terms that will govern your use of our “Services,” you will need to read the full Privacy Policy and Cookie Policy.

3. Our Commitment to You

We understand the importance of maintaining the confidentiality and privacy of Your Information. By entrusting us with Your Information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of Your Information.

4. Your Consent to Collection and Use of Personal Information

The Company collects information directly from you, through any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website, mobile app, subscribe to our service or any other activities carried out on our website or any connected applications. Please note that when you access our Website we collect non-identifiable information in the following ways:

- Contact Data – we collect, which may include, but are not limited to, your first name, last name, nationality, date of birth, telephone number (landline and mobile), fax number, email address and postal address
- Personal and Professional Information - we collect, which may include, but are not limited to, your marital status, education, occupation, information regarding your financial situation such as source of wealth and gross annual income, tax identification number.
- Cookies (including third party Cookies) – *Please refer to section 11 “Cookies”*
- Financial data – to use the Company’s services, we may require to collect certain information, such as bank details, trading activity, transaction history, account balance information.

The Company will need to obtain the following documents for verification purposes of Clients' trading accounts which are not limited to:

- a) Proof of Identification (e.g. Passport/ID/Driver's License)
- b) Proof of Address (e.g. Utility Bill, bank letter)
- c) Proof of Payment (e.g. Bank Statement)

The Company has the right to request additional documents and information to carry out its due diligence where it deems fit. We only collect personal data that is adequate and relevant for the purposes of our business and for a reasonable period of time as required by law. We never ask for more information that is required by law.

If you have given us your specific consent for processing (other than for the reasons set out above) then the lawfulness of such processing is based on that consent. You also consent when the Company is transferring your personal information outside the European Economic Area ("EEA") where this is necessary for the Company to fulfil its contractual obligations to you (see section 12 below). You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

5. Why We Process and Use Your Information

We are committed to protecting your privacy and handling your data in a transparent manner, and as such we collect, use, disclose, store and process your personal data for the performance of our services as required by law.

Furthermore, we are obligated to collect such personal data not only for the commencement and execution of a business relationship with you but also for the performance of our contractual, regulatory, statutory and legal obligations.

Based on the requirements of our regulated authorities in our efforts to maintain our Know-Your-Client procedures, we will require to verify clients' trading accounts, so to ensure our clients meet appropriateness and suitability requirements, process transactions, send information about transactions/services and keep you updated with products, services and news.

We further collect data to operate, provide, improve, understand, customise and support our services in relation to your account.

We may collect your personal information through our App(s), one of our social medial channels, public databases; joint marketing partners; from people with whom you are connected on social

media platforms, as well as from other third parties. Use of this personal information, allows us to deliver information by email, SMS, push notification, email, in-app notification or contact you by telephone or by any other means to provide you with information about our products, services, training and offers we think would be of interest to you. Such information is secured and treated as confidential. We always give you the right to opt out/unsubscribe to receiving such communications from us at any time.

6. Disclosure of your Personal Data

When providing our services or conducting our business operations, if necessary, we may disclose or share your personal data. Such sharing of data is in accordance with the Company's internal security policies and applicable data privacy laws. We do not sell the personal data we collect from you, or we do not distribute/transfer any personal data to any unauthorized or non-affiliated third parties.

All the Company's external services providers and suppliers enter into contractual agreements with us, by which they legally agree to confidentiality and data protection to the data protection law and General Data Protection Regulation (EU 2016/679) ("GDPR"). Recipients with whom we may disclose or share your personal information, may include the following:

- a) Within the Company – such as various departments within the Company, where all employees and contractors are required to follow our data privacy and security policies when handling personal data.
- b) Supervisory and other regulatory and public authorities, notary offices, tax authorities, criminal prosecution authorities as much as a statutory obligation exists
- c) Third Party service providers – such as, and which are not limited to, financial institutions, banks and payments processing providers, external and internal auditors, financial and business advisors, fraud prevention agencies, Debt collectors subject to bankruptcy or insolvency claims, External authorised processors for processing client data, software system and platform support, cloud hosting services, data analytics, direct marketing/advertising services.

7. Safeguard Measures

The Company takes reasonable precautions to protect Personal Information from loss, theft, misuse, unauthorized access or disclosure, alteration, or destruction.

The Company employ physical, electronic, and procedural safeguards to protect Personal Information and it does not store Personal Information for longer than necessary to provide the

Service or as permitted by law.

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit. The Company does not store or collect any Credit Card data. All credit card information is stored on the payment provider side. All payments made between Company and Client, and vis a vis, via the Company's merchant accounts and/or third party payment processing service providers, the Client will receive unique billing descriptor on their card statement from the bank, confirming the payment and which may include, but not limited to, the description "Rynat Trading Ltd, branded website and Customer support service telephone number.

The Company's datacenter(s) contain both internal and external servers. Access to the Company's internal server is restricted to pre-approved persons, servers and locations; our external servers can be accessed via the Internet. Your Information is stored and encrypted on secure servers and our servers can only ever be accessed by authorized personnel.

While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

8. Duration of keeping Your Information

You may request from us to erase/delete your personal data in cases where there is no rationale as to the need for us to continue to process it. However, we may not be able to comply with your request due to regulatory requirements by which you will be notified accordingly.

We will not keep Your Information for any longer than is required for legal and/or business purposes. In many cases, information must be kept for considerable periods of time, subject to a maximum of seven (7) years. Retention periods will be determined considering the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

9. Your Legal rights

You have the following rights under data protection laws in terms of personal data we hold about you:

- a) Receive a Copy of your personal data – you have the right to have access to your personal data, where your personal data is stored, how we collected your data and for what purposes. Your request to obtain your personal data must be sent to us in writing via a durable medium, where we will process your request in accordance with the applicable law(s).

- b) Request rectification/correction of the personal data we hold about you – you can at any time have the right to correct any inaccurate or incomplete data we hold about you. If this applies to you, please reach to our Customer Support Team.
- c) Request erasure of your personal information – you have the right to request deletion of your personal data (“right to be forgotten”). Please bear in mind that, as we are a FSA licensed investment firm, we are under certain legal obligation to hold your data for a maximum of seven (7) years.
- d) Object to processing of your personal data – you have the right to object to the processing of your personal data. Please bear in mind that, as a FSA licensed investment firm, should you object to processing certain data, then we may not be able to provide you our services.
- e) Right to data portability – you have the right to request for your personal data to be transferred to a third party, your request to transfer your personal data must be sent to us in writing via a durable medium, where we will process your request in accordance with the applicable law(s).
- f) Data being processed for direct marketing purposes – you have the right to object for your personal data to be used for direct marketing (this includes profiling), where you can unsubscribe to our direct marketing campaigns.

Please note that for all the above mentioned, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any unauthorized third party. In certain circumstances relevant legal requirements may prevent us from providing your personal information.

10. Cookies

We use cookies to help us find which services you are interested in and remember details about your application. We don't store sensitive information like your name or address in our cookies, just an anonymous reference to them so that we're able to find them. We also occasionally set Cookies to help you navigate around the site, enhance your experience, or give you important information regarding interests.

When you access our Website, we collect information that your browser sends whenever you visit the Website or an online service (“Cookies”). Such Cookies may include, but is not limited to, your computer’s Internet Protocol address, browser type, the web page you were visiting before you came to the Site and information you search for on the Site. In addition, if you access

the Website via a mobile device, we may collect a PushID, subject to your consent as indicated by you in the mobile application, and a Mobile IP.

You can choose to disable or block these cookies in your browser but without some of them our site will not be able to give you the best experience possible.

11. Geographical processing of Personal data

All your personal data is processed within the European Economic Area (“EEA”). In some cases, when we provide our services to you, your personal data may be transferred to and processed within countries outside the EEA, such jurisdictions may not offer the same level of data protection as in the EEA. Through accepting provisions of our services to you, you acknowledge and consent to such transfer.

12. Questions

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at info@topline.com

If you are not content with our response and have concerns or believe we are not processing your personal data in accordance with the law, you have the right to escalate your complaint to the data protection regulator in your jurisdiction.

13. Update of this Policy

This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.