



GLOBIANCE X LIMITED

(Trading as *Globiance*)

Registration Number: 2083564

Privacy Policy

March 2022

DOCUMENT GOVERNANCE	
Owner	Globiance X Limited
Policy Name	Privacy Policy
Date Adopted	01/03/2022
Date Last Updated	01/03/2022
Version	v01

Table of Contents

PRIVACY POLICY	3
2. Collecting Personal Information.....	3
3. Consent.....	4
4. Registration of a Globiance Account.....	4
5. Personal Information Collected by Globiance.....	4
6. Personal Information Collected May Include the Following:.....	4
7. How we use and share personal information we collect:.....	5
8. Cookies.....	6
9. Accessing Your Personal Information.....	6
10. Security.....	6
11. Dispute Resolution	7
12. Policy Approval	8
Table A	8
13. Document Modification History.....	8
Table B	8

PRIVACY POLICY

1. Overview

- 1.1 At Globiance X Limited, we value Your trust and respect Your privacy.
- 1.2 This Privacy Policy provides You (hereinafter referred to as the “*User(s)*” and/or “*You*” respectively) with details about the manner in which Your data is collected, stored, and used by **Globiance X Limited** holding registration number **2083564** and registered at *3rd Floor, J&C Building, Road Town, Tortola, BVI, VG1110* (hereinafter referred to as “*Globiance*”, “*We*”, and/or “*Us*” respectively).
- 1.3 User(s) are advised to read this Privacy Policy carefully and ensure the appropriate understanding thereof.
- 1.4 By visiting Globiance Sites, User(s) expressly consent to use and disclose the required personal information in accordance with this Privacy Policy.
- 1.5 If User(s) do not agree to the terms of the Policy, access and usage of the Globiance Services is prohibited and unauthorised. Globiance may, at its own discretion and without notification to User(s), amend and/or update this Privacy Policy from time-to-time.
- 1.6 To ensure User(s) adequate knowledge of any amendments and/or updates, kindly review the Privacy Policy periodically.
- 1.7 Date of last update can be viewed at the end of the Policy.

2. Collecting Personal Information

- 2.1 Should User(s) wish to transaction and/or make use of the Globiance Services and/or Site, appropriate requested information will be collected by Globiance and/or its representatives from said User(s).
- 2.2 This information includes information of a personal nature.
- 2.3 Personal information requested by Globiance includes, but is not limited to, the following: full name of User(s), address for service, unique government-issued identification information, and banking information.
- 2.4 The above-listed information is necessary for the following purposes:
 - i. To establish and maintain a responsible commercial relationship with User(s);
 - ii. To understand User(s)’ needs and eligibility for products and services;
 - iii. To inform User(s) about trading and financing features;
 - iv. To provide information to User(s) about developments and new products, including amends and enhancements to the Globiance Site;
 - v. To develop, enhance, and market provided products and services, as well as the provision of said products and/or services;
 - vi. To process billing and/or collection of any fees;
 - vii. To conduct surveys and obtain feedback from User(s);
 - viii. To deliver products and services to User(s);
 - ix. Provide User(s) with news and other matters of general interest to User(s); and
 - x. To meet Globiance’s legal and regulatory requirements.

3. Consent

By using the Globiance Site and/or by providing Your information, User(s) consent to the collection and use of the information disclosed in accordance with this Privacy Policy, including but not limited to, User(s) consent for sharing information as per this Privacy Policy.

4. Registration of a Globiance Account

4.1 In order to use any of the Globiance Services, User(s) must first register by providing their full name, an e-mail address, unique password, and affirming acceptance and acknowledgement of these Terms.

4.2 Globiance may, at Our sole discretion, refuse access and/or establishment of a Globiance Account and/or limit the number of Globiance Accounts that a single User may establish and/or maintain at any time.

5. Personal Information Collected by Globiance

5.1 Personal information collected by Globiance can and may be used to assist the appropriate authorities in the fight against the funding of terrorism and money laundering activities.

5.2 What this means for User(s): When You open an Account, Globiance requests your name, address, date of birth, and other identifying personal information; this provided information may be used where necessary and obligated to assist the authorities responsible for the prevention and/or investigation of money laundering, funding of terrorism and related financial crimes and activities.

5.3 In addition, Globiance is a global company and thus may conduct business and collect personal information from individuals and/or institutions located within the United Kingdom.

5.4 We are required to protect personal information processed in the United Kingdom in accordance with *The British Virgin Islands' Data Protection Act, 2021* (hereinafter referred to as the “*DPA*”).

6. Personal Information Collected May Include the Following:

6.1 Individual Customer – Globiance attempts to collect, verify, and authenticate the following information:

- i. Email address;
- ii. Contact number;
- iii. Full legal name;
- iv. Passport number or any comparable identification number issued by an appropriate government authority (e.g., national identification number);
- v. Date of birth;
- vi. Proof of identity (e.g., driver's license, passport, or government-issued identification documentation);
- vii. Physical home address (excluding a mailing address and/or P.O. Box); and
- viii. Additional personal information and/or documentation at the discretion of the Globiance Compliance Team.

6.2 Legal/Juristic Customer - Globiance attempts to collect, verify, and authenticate the following:

- i. Institution legal name;
- ii. Institution registration number;
- iii. Full legal name (of all account signatories and beneficial owners);
- iv. Email addresses (of all account signatories and beneficial owners);

- v. Contact numbers (of all account signatories and beneficial owners);
 - vi. Institution registered address (principal place of business and/or other physical location);
 - vii. Proof of legal existence (e.g., state certified articles of incorporation or certificate of formation, unexpired government-issued business license, trust instrument, or other comparable legal documents as applicable);
 - viii. Contract information of owners, principals, and executive management (as applicable);
 - ix. Proof of identity (e.g., driver's license, passport, or government-issued identification documentation) for each individual beneficial owner that owns **10%** or more of the institutional customer Entity, as well as all account signatories;
 - x. Personal information for each entity beneficial owner that owns **10%** or more of the institutional customer entity (see the "Individual Customer" section above for details on what personal information is collected for individuals);
 - xi. Device information – Information that is automatically collected about User(s) device(s) (such as, but not limited to, hardware, operating system, browser, etc.);
 - xii. Location information – Information that is automatically collected via analytics systems providers to determine User(s) location, including User(s) IP address and/or domain name and any external page that referred User(s) to Globiance;
 - xiii. Log information – Information that is generated by the User(s)' use of Globiance that is automatically collected and stored in Our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to Globiance pages that you visit;
 - xiv. Account information – Information that is generated by the User(s) account activity including, but not limited to, trading activity, order activity, deposits, withdrawals, and account balances.
 - xv. Correspondence – Information that User(s) provide to Globiance in correspondence, including opening an account, and with respect to ongoing customer support.
- 6.3 You will be allowed to access, review, correct, and ensure the accuracy of the personal information provided from time-to-time. Globiance will also do Our part in ensuring the accuracy of User(s) personal information.
- 6.4 Personal information you provide during the registration process may be retained, even if and/or when User(s)' registration is left incomplete and/or abandoned. If User(s) are located within the United Kingdom, your personal information will not be retained without the User(s)' consent.
7. How Collected Personal Information is Used and Shared
- 7.1 The personal information collected, and the practices described above are performed in an effort to provide User(s) with the best experience possible, protect User(s) from risks related to improper use of Globiance Services and fraud, and help Globiance to maintain and improve provided services.
- 7.2 We may share personal information with third-party service providers (including those that may be located outside of the User(s)' country), who help Globiance operate Our platform and systems, and detect fraud and security threats throughout the normal course of Our business and service fulfillment. Such third-party service providers are subject to strict confidentiality obligations. In addition, Globiance may be compelled to share personal information with law enforcement, government officials, and regulators.
- 7.3 If Globiance decides to modify the purpose for which User(s)' personal information is collected and used, We will amend and/or update this Privacy Policy.
- 7.4 If Globiance proposes to sell and/or buy any business and/or assets, We may disclose User(s)' personal information in an anonymized form to the prospective buyer and/or seller of such business and/or assets. In the event of a merger, acquisition, or asset sale, Globiance will provide User(s) with notice if, and

before, your personal information is transferred in a non-anonymized form or becomes subject to a different Privacy Policy.

- 7.5 We do not sell customer personal information to third parties for the marketing purposes.
- 7.6 Please be aware that Bitcoin, Ether, and other Digital Assets are not necessarily truly anonymous. Generally, anyone can see the balance and transaction history of any public Digital Asset address. Globiance, and any others who can match your public Digital Asset address to other personal information about User(s), may be able to identify You from a blockchain transaction. This is because, in some circumstances, personal information published on a blockchain (such as User(s)' Digital Asset addresses and IP addresses) can be correlated with personal information that Globiance and others may have.
- 7.7 This may be the case even if Globiance, or others, were not involved in the blockchain transaction. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other personal information about User(s). As part of Globiance's security, anti-fraud and/or identity verification and authentication checks, We may conduct such analysis to collect and process such personal information about User(s).
- 7.8 You agree to allow Globiance to perform such practices and understand that We do so.

8. Cookies

- 8.1 A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser.
- 8.2 Globiance Site(s) uses cookie and tracking technology depending on the features offered.
- 8.3 No personal information will be collected via cookies and other tracking technology; however, if User(s) previously provided personally identifiable information, cookies may be tied to such information.
- 8.4 Aggregated cookie and tracking information may be shared with third parties.

9. Accessing Your Personal Information

You may access and verify your Personal Information held by Globiance by submitting a written request to Our support team at support@Globiance.com.

10. Security

- 10.1 Globiance has stringent security measures in place to protect the loss, misuse, and/or alteration of the information under Our control.
- 10.2 Whenever User(s) change and/or access Your account information, We offer the use of a secure server. Once User(s)' information is in Our possession, Globiance adheres to strict security guidelines, protecting it against unauthorized access.
- 10.3 Globiance does its best to protect and safeguard personal information, but there are protective measures you should take, as well.
- 10.4 Do not share your personal information with others unless you clearly understand the purpose of their request and you know with whom you are dealing.
- 10.5 Do not keep sensitive personal information in your e-mail inbox and/or on Webmail.
- 10.6 If you are asked to assign passwords to connect you to your personal information, you should use a secure password and always use two-factor authentication (2FA), where available. User(s) are advised to change their password(s) regularly.

11. Dispute Resolution

- 11.1 The law of the British Virgin Islands, and ultimately that of the United Kingdom, shall apply to this Privacy Policy.
- 11.2 All disputes arising from this Policy will be settled by the negotiations and/or mediation of the involved parties.
- 11.3 If the dispute(s) resulting from this Policy could not be settled by the negotiations and/or mediation of the involved parties within a reasonable timeframe, the dispute will be solved in the British Virgin Islands.

Date Last Updated: 1st of March 2022 (01/03/2022).
