

## Innomp Group Limited

### PRIVACY POLICY

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**Innomp Group Limited** (the “Company”) is committed to protecting the privacy and confidentiality of its clients’ personal and financial information. By opening a trading account or otherwise engaging with the Company, clients consent to the collection, processing, storage, and use of their personal data as described in this Policy.

This Policy reflects the Company’s commitment to international data protection standards, including principles derived from the EU General Data Protection Regulation (GDPR), where applicable.

## **1. Collection of Personal Information**

The Company collects only the personal data necessary to:

- open and operate client accounts;
- process transactions;
- verify identity;
- manage risk and safeguard client assets; And
- deliver services tailored to client needs.

Data may be collected directly from clients (through application forms, communications, or uploaded documents) or indirectly from trusted third parties (e.g., banks, payment processors, identity verification providers, or business introducers).

Examples of personal data collected include:

- identification details (name, date of birth, nationality, government-issued ID);
- contact details (address, phone number, email);
- financial and employment details (income, occupation, employer, source of funds);
- transactional and trading history with the Company;
- technical information such as IP address, device identifiers, or browsing behaviour when using the Company’s online systems.

## **2. Use of Personal Information**

The Company processes personal information for legitimate business purposes, including:

- providing trading and ancillary services;
- verifying identity and conducting due diligence;
- managing the client relationship;
- improving products and services;
- notifying clients of relevant products, services, or promotions (subject to opt-out rights);
- complying with legal obligations where applicable; and
- safeguarding against fraud, abuse, or misuse of services.

Clients may opt out of receiving promotional communications at any time by contacting the Company.

### **3. Protection of Personal Information**

The Company treats all personal information as confidential and employs appropriate technical, administrative, and physical safeguards to protect data against unauthorized access, alteration, disclosure, or destruction.

Measures include:

- Secure Socket Layer (SSL) and Transport Layer Security (TLS) encryption;
- firewalls and intrusion detection systems;
- password and multi-factor authentication protocols;
- restricted staff access to sensitive information; and
- secure storage of physical and electronic records.

While the Company takes reasonable measures to protect data, clients acknowledge that transmission of information over the Internet carries inherent risks. The Company cannot guarantee absolute security of data transmitted online..

### **4. Sharing with Affiliates and Partners**

The Company may share client information with its affiliates and business partners only to the extent necessary to deliver services, process transactions, or offer related products and services (with the client's prior consent).

All affiliates and partners receiving such information are required to maintain standards of confidentiality and data protection consistent with this Policy.

### **5. Disclosure to Third Parties**

The Company does not sell, lease, or trade client data. Disclosure is limited to:

- where required by law, court order, or competent authority;
- service providers (e.g., IT, payment processing, identity verification, customer support), strictly for the purpose of fulfilling contractual obligations;
- business introducers or agents, where clients were referred, in accordance with contractual arrangements; and
- credit or collection agencies where reasonably necessary.

Third parties are contractually required to protect client data to standards at least equivalent to those adopted by the Company.

## **6. Client Communications**

The Company may contact clients by email, telephone, or other means for purposes including account administration, service improvements, and relevant promotional offers.

Clients retain the right to opt out of marketing communications at any time.

## **7. Restriction for External Links**

The Company's website may contain links to third-party websites. The Company is not responsible for the content, practices, or privacy policies of such external sites. Clients are advised to review the privacy policies of any linked websites independently.

## **8. Use of Cookies**

The Company uses cookies and similar technologies to enhance site performance, secure trading activities, and personalize user experiences.

- Cookies do not contain personal identifiers.
- Usage statistics may be shared with advertising and analytics partners, but the data is anonymized.
- Clients can manage cookie preferences through browser settings, though disabling cookies may impact website functionality

## **9. Accessing, Correcting, and Erasing Personal Data**

Clients have the right to:

- request access to personal data held by the Company;
- request correction of inaccuracies;
- object to the use of data for marketing purposes;
- request erasure of data ("right to be forgotten"), subject to applicable legal or contractual obligations.

Requests must be submitted in writing to the Company's designated Data Protection Officer. The Company may charge a reasonable fee to cover administrative costs where permitted by law.

## **10. International Data Transfers**

Where client data is transferred outside of Saint Lucia (e.g., to affiliates or service providers in other jurisdictions), the Company ensures that adequate safeguards are in place, consistent with internationally recognised data protection standards.

## **11. Policy Updates**

The Company may amend this Privacy Policy from time to time. Updated versions will be published on the Company's website and shall take effect immediately upon posting. Clients are encouraged to review the Policy periodically to remain informed.

Any disputes relating to this Policy are governed by the Client Agreement and the laws of Saint Lucia.