

Privacy Policy

[Capplace.com](https://www.capplace.com) operated by Robertson Finance Inc (“Capplace”, “we”, “us”), acknowledges the importance of safeguarding your privacy and personal data and we strive to provide clarity and openness in how we collect and process them when using our services or when browsing on our site.

Please read this Privacy Policy which illustrates the process of collecting, storing, and using your personal data while also explicating the relevant responsibilities, and rights that may be derived. In line with this, we note that this Privacy Policy is addressed to current and prospective clients (“You”, “user”, “visitor”, “client”).

It is important that you read this Policy alongside the applicable Terms and Conditions that are also available on our website, as together constitute a binding agreement between Capplace and you. The content of this Policy applies to you unless otherwise applicable based on your residency status.

To be eligible to subscribe for our services you need to satisfy a certain age eligibility criteria. This is to note that we do not provide services to individuals who are not over 18 years old of age or the minimum age in the relevant jurisdiction. If any personal information was collected and it came to our attention that belongs to a minor, it will be promptly deleted.

You agree to provide true, complete, accurate, and current information about yourself when you use our services or when registering for our services. In case there is an update of such information you kindly requested to notify us. In case there is suspicion that the data provided is not true, accurate, current, or complete, we may deny or terminate your access to the services.

1. Collected Data

We may collect personal data provided by you when visiting/browsing on our site or when contacting us via the contact information available on our side or when registering for our services and during the provision of our services.

To do so we use equipment and tools e.g. cookies, JavaScript, web beacons, etc. that we utilize to measure and analyse visitors' behavior online. We note that Capplace may allow third parties to place cookies, web beacons, and similar technologies to collect information via our services. Please refer to section 4 of this Policy and to our Cookies Policy available on our website for more details.

Please refer to *Table A* below which depicts the categories of personal data we collect.

Table A

Identity Data	full name, date of birth, gender, passport, ID, residency full address, and driving license details
Contact Details	e-mail addresses, telephone numbers, and billing addresses
Location Data	geographical information about the visitor's specific device's whereabouts associated with a time identifier. This may include: <ul style="list-style-type: none"> i. the latitude, longitude, or altitude of the terminal equipment; ii. the direction of travel of the user; or iii. the time the location information was recorded; iv. time zone, interface language.
Payment Details and Financial Data	bank account, payment account/card details, tax identification number, and data related to your economic and financial profile provided during the filling of the onboarding questionnaire such as occupation, annual income, and other data provided by you necessary to facilitate the processing and execution of payments.
Marketing & Communication Data	visitor's/client's preferences, feedback, and/or information received while interacting with us within the course of providing our services.
Digital/ Technical Data	cookies, metadata (i.e. set of data that describes and gives information about other data), online identifiers, such as internet protocol addresses (IPs), login data, browser type and version, and other information collected on the devices you use when you access our Site and platform.
Transaction Data	details on the transactions executed/declined, details about deposits & withdrawals, trading history, profit & balance, and any other details in relation to the services you have made use of via our website and platform.
Profile data	your client account details, username, and credentials.
Sensitive data	religious belief, and data regarding your background including criminal convictions and offenses.

Personal data depicted in *Table A* above constitute any information relating to physical persons who can be identified directly or indirectly. We may also collect statistical or demographic data in an aggregated form, thus not being able to identify you personally. Collected data in aggregated form constitute information referring to particular groups based on specific demographic or behavioral variables that are not- personally identifiable information.

2. Purpose of collecting personal data from you

We collect and process personal data from You:

❖ ***To perform a contract with you:***

We collect and process personal data that is necessary for the performance of a contract with you or to complete necessary checks and preliminary acts prior to the commencing of a contract. In particular, the collection of your personal data is essential to enable us to provide the requested services to you, to give you access to certain services, or to verify your identity.

❖ ***To facilitate payments:***

To ensure the processing and the execution of payments for the offered Services and ensure compliance with the applicable regulations.

❖ ***For legitimate interests:***

The processed data contributes to the overall understanding of our website usage by the visitors and helps us to maintain and improve our services. Moreover, the personal data we collect from you enables us to tailor offered services to your preferences and needs. Overall, our processing of your personal data promotes a trusted environment with safer elements giving us the right grounds to investigate, detect, prevent, or report potential security breaches or other illegal activities.

❖ ***For communication purposes:***

The collection and processing of your personal data allow us to reply to your inquiries or complaints and keep in touch with you or inform you about our services. We use personal data for promotional offers and direct marketing. Where your personal data are processed for direct marketing purposes, you have the right to object at any time to its processing.

❖ ***To comply with the applicable laws and regulations:***

To comply with our legal obligations including without limitation to applicable Anti-Money Laundering and Terrorist Financing laws and regulations and in response to lawful requests for information from the government or through legal process.

❖ ***For other reasons:***

We may process your data for the fulfillment of any other purpose disclosed to you in connection with our services or when it is necessary to perform a task in the public interest with a clear basis in law. Moreover, we process personal data for the protection of your vital interests or of another natural person. We process your personal data when to do so we require your prior consent.

3. Cookies

Cookies are a small amount of data that is sent to the visitor's browser and stored on your computer's hard drive. We may use Cookies to record our website performance or check the effectiveness of any online advertising. We use cookies to gather data relevant to our site visitor's preferences and get valuable information. We used the collected information to improve the overall functioning of our website and adjust it to the visitor's preferences.

Visitors need to be aware that their browser may be preset to accept cookies or to notify them of the potential installation of cookies when they access a website. In this respect, you may adjust your browser settings in accordance with your needs or even disabling, deleting, and blocking cookies. Please see more information on our Cookies Policy available on our Site.

Please refer to our Cookies Policy for more information.

4. Security of your personal data

i) Maintenance of safeguards and security measures:

We maintain appropriate physical, electronic, technical, and organisational procedural safeguards and security measures, ensuring the protection of your personal data against unauthorized access, use, alteration, disclosure, or destruction of personal data.

ii) Employee training and awareness:

The employees who are involved in the process of handling personal data are fully aware and trained regarding the applicable procedures established for the purpose of ensuring the security of personal data.

iii) Access rights and permissions:

In our efforts to reduce unauthorised intrusion into your personal data, we have granted levels of access to the Company's employees, enabling them to perform their specific tasks with limited exposure to your personal data.

We provide access to your personal data to authorised personnel, directors, and shareholders to the extent that such access facilitates the provision of our services and the purposes for which such data was processed. Capplace may also transfer or allow access to your personal data to:

- Our suppliers, service providers, and representatives are engaged or will engage with us to assist in providing our services. We may also share anonymized data in aggregated form with third parties, partners, advertisers, or connected sites.
- Group entities and successors in title to our business or with the prospective owners of the business or company. Such processing may be carried out during the initial discussions to examine any proposed sale or re-organization or after the sale or reorganization for them to use for the same purposes as set out in this Notice;
- Auditors, legal advisors, witnesses, experts, and judicial and quasi-judicial authorities to protect us against harm to the rights, property, or safety of the company, our users, or the public as required or permitted by law, and other third parties to enforce applicable Terms of Service, including investigation of potential violations;
- Administrative or judicial authorities in order to meet the requirements of any applicable law, regulation, legal process, or enforceable governmental request.

It is noted that no data transmission online over the internet or website can be guaranteed to be secure from intrusion. You need also to ensure that your personal data are kept safe e.g. keep credentials provided to you secure and confidential. It is strictly prohibited to share your login credentials (incl. username and password) with other physical or legal persons. In the case you become aware that your passwords were stolen, or lost, or you suspect that there was an unauthorised use of your account, please contact us immediately.

If we have reasonable grounds to believe that your personal data are compromised, we will notify you without any undue delay.

5. Transfer of data

We may process your personal data in countries where the applicable standards and laws may be of a lower standard than those in your home country. In this respect, we will take steps to ensure that your personal data receives an adequate level of protection. In case you reside within the European Union and your personal data is transferred to a service provider for processing in any country outside the EEA, that is not recognized by the EU Commission as providing an adequate level of protection for personal data, we ensure that there are in place appropriate safeguards. The transferring of personal data shall be carried out for the purposes explained herein.

6. Data Retention

The retention period of your personal data is determined to be as long as necessary to serve the purpose of its processing and that is depicted in this Policy. After the lapse of such a period, your personal data may either be deleted or irreversibly anonymized. We may keep your personal data

for a longer period in case there is a need to comply with applicable legal standards and meet legal obligations or protect our legitimate interests.

7. Your rights

Please see *Table B* below with the rights emanating from the processing of your personal data:

Table B

The Right to Access:
You have the right to access your personal data at any time. To exercise this right, you can request us to provide you with a copy of the personal data we keep about you.
The Right to Rectification:
You have the right to request the correction/rectification of any incomplete or inaccurate data we hold about you. In this respect, we may need to verify the accuracy of the new data you provide to us.
The Right to Erasure (“right to be forgotten”):
You have the right to request us to delete/erase your personal data where it is deemed that the purpose of processing it has been completed. Additionally, you may request us to delete your personal data in case you have successfully exercised your right to object to the processing, where we may have processed your data unlawfully, or where we need to delete your personal data to comply with the law. We will proceed with your request unless there is a reason to object to such a request in line with the applicable law or our rights disclosed herein.
The Right to Object:
You have the right to object to the processing of your personal data when is carried out for direct marketing purposes. Moreover, you can object to the processing of your personal data on grounds relating to your particular situation based on your legitimate interest and if you feel that the processing has an impact on your fundamental rights and freedoms. If you exercise your right to object, we will no longer process your personal data unless we demonstrate that we have compelling legitimate grounds that override your interest, rights, and freedoms or for the exercise or defense of legal claims.
Right to Restrict Processing:
You have the right to request Capplace to restrict the processing of your personal data: ➤ where the processing is unlawful, and you oppose its erasure;

<ul style="list-style-type: none"> ➤ if you want us to establish the accuracy of your personal data; ➤ when we no longer need your personal data for the purposes of the processing, but we are required by you for the establishment, exercise, or defense of legal claims; ➤ if you have objected to our use of your data but we are in the process of verifying whether we have an overriding legitimate grounds to use it.
The Right to Data Portability:
You have the right to request the transfer of your personal data to You or another party in machine-readable format.
The Right not to be subject to automated decision-making:
You have the right not to be subject to a decision when it is based on automated processing, and it produces an adverse legal effect or significantly affects you.
The Right to Withdraw Your Consent:
To the extent that the legal basis for the processing is your consent, you have the right to withdraw from that consent at any time. Such a withdrawal request cannot have any impact on the lawfulness of any processing carried out before the withdrawal of consent.
Right to file a complaint:
You have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of personal data relating to You infringes the applicable regulation.

8. Links

Our website may include links/hyperlinks linking to websites, landing pages, and sites owned by third parties. Such links are not owned by Caplace nor controlled in any way by us. In this respect, we accept no responsibility or liability for any harm loss, or breach arising by accessing such links. Before accessing or disclosing your data on any other websites owned by third parties, we encourage you to read their applicable terms and conditions, privacy policies, or other procedures.

9. Updates of the Privacy Policy

We reserve the right to amend this Privacy Policy in the future at our discretion in order to ensure that the information herein provides up-to-date and relevant information. Such updates may take place as a response to changing legal, regulatory, or operational requirements. Any amendments to this Policy will be published on the Company’s site. In case we make changes that require your prior consent we will notify you as applicable.

10. Contact details

In case you would like to exercise any of your rights depicted above or if you have any questions regarding this Privacy Policy, please contact us at: support@caplace.com