APRIL 2025

OFinancial LLC

PRIVACY POLICY

Company No [228982 GBC] | Licence No [GB25205138]

1.0 Our Commitment to You

We understand the importance of maintaining the confidentiality and privacy of personal information that we hold about our clients and others. This Privacy Policy Statement outlines how OFinancial LLC, hereinafter referred to as 'the Company' or 'we' manage and protect the personal information you give us and hold about our clients ("The Policy"). By visiting our website and using our services, your agreement to this Policy is implied. We are bound by the Mauritius Data Protection Act 2017.

This Policy will be reviewed periodically to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. You should check this page from time to time to ensure that you are happy with any changes. Any information held will be governed by our most current Policy.

2.0 Collection and processing of personal information

We may collect and process the following data about you:

- Information that you provide by filling in forms on our Website and/or on our Mobile Applications, including information provided when registering to open an Account, using our Website and/or Mobile Applications, subscribing to our services or posting material;
- If you contact us or respond to surveys we may keep a record of that correspondence;
- Details of any orders or transactions (historic or otherwise) that you have carried out through our Website and/or Mobile Applications;
- Details of your visits to our Website and/or Mobile Applications including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access;
- Information about your computer and/or mobile device, including IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This data does not identify any individual.

3.0 How we use cookies

When you use our website we will use cookies to distinguish you from other users of our Website and/or Mobile Applications. This helps us to provide you with a more relevant and effective experience when you browse our Website, including presenting websites according to your needs or preferences and allows us to improve the site generally. For further information, please see our Cookie Policy.

4.0 How we use the information

We use information held about you in the following ways:

- to ensure that the content in our website is presented to you in the most effective manner;
- to provide you with products and services that you request from us or, where you have consented to be contacted, for products and services that we feel may be of interest to you;
- managing and administering the products and services provided to you;
- keeping you updated as a client in relation to changes to our services and relevant matters;
- to carry out our obligations arising from any contracts entered into between you and us.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by email.

5.0 Who we disclose the information to

Depending on the products and services concerned and the relevant restrictions on sensitive data, personal information may be disclosed to:

- Potential successors in title to our business;
- third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
- any organisation or person acting on your behalf to whom you request us to provide information, including your financial advisor, broker, solicitor or accountant;
- third parties where it is necessary to process a transaction or provide services you have requested;

- to a Trade Repository or similar;
- Banks (where they request additional information following payments that you have made);
- credit providers, courts, tribunals and regulatory authorities in response to legal and regulatory requests or other government agencies, as agreed or authorised by law;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, in any jurisdiction where we operate;
- at your request or with your consent.

6.0 Rights in relation to your personal information

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting through an email on our website.

You also have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. To make a request, please write to us, verifying your identity and specifying what information you require.

We may charge an administrative fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

7.0 Safeguard Measures

We hold personal information in a combination of secure computer storage facilities and paper based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We limit access of information only to those relevant employees or partners that need to know the information in order to enable the carrying out of the Agreement between us. We are PCI DSS compliant therefore are entitled to store credit/debit card details (yet we self-impose a restriction that we do not store CVV numbers).

We have procedures in place regarding how to safeguard and use Your Information, for example by requesting our Affiliates and employees to maintain the confidentiality of Your Information.

We will not keep your personal information for any longer than is required. In many cases, information must be kept for considerable periods of time. However, when we consider that information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

While we will use all reasonable efforts to safeguard our clients' personal 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.

8.0 Your consent

By submitting any personal information (including, without limitation, your account details) to us you consent to the use of information as set out in this Policy. We reserve the right to amend or modify this Privacy Policy and if we do so we will post the changes on the Website and Mobile Applications. It is your responsibility to check the Privacy Policy when you submit information to us. Your use of the Website and/or Mobile Applications will signify that you agree to any such changes.

9.0 Personal information and other websites

We are not responsible for the privacy policies and practices of other websites even if you accessed a third-party website using links from our Website. We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

10.0 How to contact us

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 and/or Mobile Applications, you may email us at an email displayed at our website and/or Mobile Applications, contacting our Data Protection Officer.