

# DATA PROTECTION POLICY

In the course of providing our services, Upifex ("Company," "we," "our," or "us") collects personal data via our website, mobile applications, and other digital platforms (hereinafter called the "Site"). This Data Protection Policy governs the collection, processing, and use of personal data in accordance with applicable international data protection laws.

## 1. Data Collection

### Personal Information

Upon registration, we collect essential personal details such as your name, email address, and phone number to create and manage your account. Additional personal information, including but not limited to your date of birth, nationality, residence status, government-issued identification numbers, financial status, and source of income, may be requested to assess the suitability of our services and to complete your trading profile.

### Identity Verification

For identity verification, we may require official documents such as passports, identity cards, utility bills, or other regulatory-compliant identification. This data is essential to comply with "Know Your Customer" (KYC) and Anti-Money Laundering (AML) obligations, including checks for fraud and political exposure. Such information is also used for client communication, updates, and service offers.

## 2. Security Measures

In order to ensure the protection and integrity of your personal data, as well as to safeguard your account from unauthorized access and potential threats, we have implemented robust security measures in line with industry best practices. These measures are designed to protect the confidentiality, availability, and integrity of your data and to maintain a secure trading environment.

### Two-Factor Authentication (2FA)

To enhance the security of your account, we utilize two-factor authentication (2FA), a method that requires two forms of verification to access your account. Upon enabling 2FA, you will be required to provide a second form of identification—typically a

time-sensitive code sent to your registered mobile device or email—alongside your usual login credentials (username and password). This additional layer of protection ensures that even if your account credentials are compromised, unauthorized access will be prevented.

#### **Encryption and Secure Data Transmission**

We use strong encryption protocols for transmitting sensitive information to and from our systems. This encryption ensures that all personal data exchanged between your device and our platform remains private and secure, protecting it from interception by unauthorized third parties. Secure Socket Layer (SSL) encryption is employed to ensure that your connection to the Site remains confidential.

#### **Regular Security Audits and Monitoring**

Our security team conducts regular security audits and monitors system activity to detect and respond promptly to any suspicious or malicious activity.

#### **Account Recovery Procedures**

If you forget your password or are otherwise unable to access your account (provided it has not been officially closed), we offer a secure account recovery process to help you regain access. This procedure includes identity verification steps to ensure that the person requesting access is the legitimate account holder.

## **3. Technical Data Collection**

#### **Automatic Data Collection**

During your use of the Site, we automatically collect certain technical data such as IP addresses, device types, browser information, network identifiers, and your browsing activity. This data helps enhance the user experience, optimize our services, and improve campaign effectiveness. We may also collect location data if you permit such access on your device.

#### **Cookies and Tracking Technologies**

We use cookies and other tracking technologies to gather information about your interactions with our Site. Cookies assist in personalizing your experience and enhancing the functionality of our services. By using our Site, you consent to the use of cookies for these purposes.

## **4. Purpose of Data Collection**

The information we collect is used for the following purposes:

- To provide and manage services related to your account.
- To ensure compliance with regulatory and legal obligations.
- To enhance and optimize the functionality of the Site.
- To prevent abuse and identify fraudulent activities.
- To facilitate dispute resolution or legal proceedings.

## 5. Data Disclosure

### Sharing with Third Parties

We will not disclose your personal information except as necessary for business purposes, including sharing data with subsidiaries, affiliates, and service providers. We may also disclose your information to comply with legal requests or governmental authorities, including law enforcement or national security agencies, when required by law or legal process.

### Requests for Client Information

If a Client requests information about another Client, such request must be submitted in writing, stating the valid reason for the inquiry. We reserve the right to reject or deny any such request at our sole discretion and will process only those requests that comply with applicable legal and regulatory requirements.

## 6. Third-Party Websites

The Site may contain links to third-party websites or services for your convenience. The Company does not control or endorse the content, privacy practices, or policies of any third-party websites. You agree that the Company is not responsible for any actions taken by third parties with respect to your personal data, and your use of third-party services is at your own risk.

## 7. Data Retention and Disposal

Personal data will be retained for as long as necessary to fulfill the purposes outlined in this Policy and in compliance with legal obligations. Once these purposes have been fulfilled, such data will be securely disposed of in accordance with our data retention policies.

## 8. Updates to the Data Protection Policy

This Data Protection Policy may be updated periodically. Significant changes will be communicated to you by posting the revised policy on our Site, and the changes will take effect upon posting. Continued use of the Site after such changes constitutes your acceptance of the updated policy.

## **9. International Data Transfers**

By providing personal information to the Company, you acknowledge that such information may be stored and processed in jurisdictions outside of your country of residence, and you consent to the transfer of data across international borders, in compliance with applicable data protection laws. The Company ensures that any data transfers comply with legal frameworks ensuring adequate protection for personal data.

## **10. Data Deletion Requests**

While the Company retains your personal data as long as necessary to fulfill our obligations to you and to comply with legal, regulatory, and operational needs, you may request the deletion of your personal data. Such requests will be processed subject to the Company's legal and regulatory obligations, and certain data may be retained in accordance with applicable laws even after account closure or data deletion requests.

## **11. Indemnity**

You agree to indemnify, defend, and hold harmless the Company, its directors, officers, employees, and affiliates from and against any and all claims, losses, liabilities, damages, costs, and expenses (including legal fees) arising from your use of the Site, violation of this Data Protection Policy, or your breach of any applicable law or third-party right.

## **12. Marketing Communications**

You hereby consent to the Company sending you communications related to updates, promotions, and services, by email or other means. You have the right to opt out of marketing communications at any time by following the unsubscribe instructions provided in such communications or by contacting us directly.

## **13. Waiver of Rights**

Any failure or delay by the Company in exercising any of its rights, remedies, or powers under this Data Protection Policy shall not be deemed a waiver of those rights. No waiver of any provision of this Data Protection Policy shall be effective unless in writing and signed by an authorized representative of the Company.