

## Privacy Policy

At Catchline, we value your privacy and are dedicated to safeguarding your personal data. This Privacy Policy outlines how we collect and handle your personal information — specifically, data related to a Client (defined below) who is an individual and can be identified through such information (referred to as "data"). We adhere to applicable data protection laws and industry best practices to ensure your data is handled responsibly.

Our goal is to maintain the most secure infrastructure of any broker globally. Through this policy, we aim to explain why you can trust us with your data and feel confident that it is protected.

We encourage you to read this Privacy Policy alongside any other privacy notices we may provide on specific occasions when collecting or processing your data. This will ensure you have a complete understanding of how and why your data is being used. Unless stated otherwise, terms defined in this Privacy Policy carry the same meanings as outlined in our Terms & Conditions.

This Privacy Policy applies to both current and prospective Clients. If you are an employee, contractor, or third-party service provider of Catchline, your personal information will be used in accordance with your employment contract, contractual relationship, or our separate policies. For more details, please contact us using the information provided in the "OUR CONTACT DETAILS" section below.

If you are part of our affiliate program or introducing broker program, we will process the data you provide under our agreement to fulfill our rights and obligations. In such cases, the term "Client" in this Privacy Policy also includes affiliates and introducing brokers, as applicable.

### 1. WHO WE ARE

Catchline is a brand operated by Catchline LLC, a company registered in St. Kitts and Nevis under company registration number L 23185. Our registered address is Lighthouse Trust Nevis Ltd, Suite 1, A.L. Evelyn Ltd Building, Main Street, Charlestown, Nevis (referred to as "Catchline" or the "Company"). Catchline acts as the data controller and is responsible for managing the personal data provided by Clients when registering for a Trading Account, Demo Account, or using any other services offered through our website (referred to as the "Website"). This term includes both desktop and mobile versions of the Website.

This Privacy Policy is issued on behalf of Catchline, the entity responsible for collecting and/or processing your data when you access our Trading Platform via the Website, whether for a Trading Account, Demo Account, or their mobile/desktop versions (collectively referred to as the "Service(s)"). At Catchline, we prioritize your privacy and are committed to protecting the data we collect, use, or have access to.

The Company implements advanced data protection policies and procedures, which are regularly updated to ensure the security of your data and account. We employ legal, administrative, and technical measures to maintain the privacy, integrity, and accessibility of your data. To prevent security incidents, we use a combination of organizational and technical strategies based on annual risk assessments.

Catchline will not disclose any private information of its Clients or former Clients unless:

- The Client provides written consent for such disclosure,

- Disclosure is required by applicable law,
- It is necessary to verify the Client's identity, or
- It is required for Catchline to fulfill its contractual obligations under any agreement with the Client.

Client information is processed only by authorized employees of the Company and/or trusted third-party service providers who assist in managing Client Accounts and delivering our services. All such information is stored on electronic and physical storage media in compliance with applicable laws.

## 2. DATA USAGE

1. We may collect, use, store, and transfer various types of data about you, categorized as follows:
  - **Audio Data:** Includes full voice recordings of calls made to or received from us.
  - **Banking Data:** Includes payment wallet details
  - **Conformity Data:** Includes details about your education, employment status, trading experience, and self-assessment test results.
  - **Contact Data:** Includes your billing address, email address, and telephone numbers.
  - **Economic Profile Data:** Includes details about your occupation, investment purpose, annual income, net wealth, expected annual investment amount, and sources of funds.
  - **Financial Data:** Includes bank account details, payment card information, and tax identification numbers (such as social security number, income tax identification number, or national insurance number).
  - **Identity Data:** Includes your first name, last name, patronymic (if applicable), date of birth, gender, passport or ID details, driver's license number, and a copy of your photo.
  - **KYC (Know Your Customer) Data:** Includes identity documents, such as copies of utility bills, ID cards, passports, or driver's licenses.
  - **Location Data:** Includes details about your actual location when interacting with our Website, such as residency country, time zone, and interface language settings.
  - **Marketing and Communication Data:** Includes your preferences for receiving marketing materials and your communication preferences.
  - **Profile Data:** Includes your account details, username and password, transaction history, interests, preferences, feedback, interactions with us, and survey responses.
  - **Special Categories of Data/Sensitive Data:** Includes details about your religious beliefs, annual income, biometric data, and/or criminal convictions and offenses.
  - **Technical Data:** Includes your IP address, login details, browser type and version, time zone, location, browser plugins, operating system, platform, and other device-related information used to access the Website, as well as cookies stored on your device.
  - **Transaction Data:** Includes details of transactions you've conducted, such as payments, withdrawals, exchanges, trading history, profits,

balances, deposit and withdrawal methods, and other service-related activities on our Website.

- **Usage Data:** Includes information about how you use the Website, products, and services, such as registration date, account category, trading cluster, number of complaints, requests filed, and IP history.

(The above categories are collectively referred to as **Personal Data**.)

2. **Aggregated Data:** Includes statistical or demographic data derived from your data but does not directly or indirectly reveal your identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific Website feature or service preference. However, if Aggregated Data is combined with other data in a way that could identify you, Catchline will treat the combined data as Personal Data and handle it in accordance with this Privacy Policy.

Catchline processes your data in compliance with the principles of lawfulness, fairness, transparency, and purpose limitation, while adhering to data minimization, accuracy, limited storage, integrity, confidentiality, and accountability.

In general, Catchline collects and processes Personal Data for the following purposes:

- To fulfill our contractual obligations to you,
  - To comply with legal obligations, including anti-money laundering and counter-terrorism financing laws and regulations (referred to as Money-Laundering Law), and/or
  - To protect our legitimate interests.
3. The Client acknowledges that all or part of the data related to their account and transactions will be stored by Catchline and may be used in the event of a dispute between the Client and the Company.
  4. The Client is responsible for updating any data provided to us in case of changes. While we strive to keep your data accurate and review the information you provide, we may not always be able to do so without your assistance. The Client acknowledges that Catchline is not responsible for any consequences arising from the review or inspection of such information.

### 3. METHODS OF PERSONAL DATA COLLECTION

We collect your personal data through various methods, including:

1. **Direct Interactions**

You may provide us with your Identity, Contact, and Financial Data directly through the Website by filling out online forms, corresponding with us via email, or other means. This data may be submitted when you:

- Register for a Trading Account;
- Register for a Demo Account;
- Subscribe to our publications or updates;
- Request marketing materials or promotions;
- Participate in competitions, promotions, or surveys; or
- Provide feedback or contact us.

We collect this data to:

- Deliver our services efficiently, and

- Fulfill our legal obligations, including fraud prevention and anti-money laundering measures.

If you fail to provide the required data, we may not be able to fulfill our contractual obligations or provide our services. In such cases, we may need to cancel a service you have with us, and we will notify you at the time. It is essential that the data we hold about you is accurate and up to date. Please inform us of any changes to your data during your relationship with us.

## 2. Automated Technologies or Interactions

When you use our services, your device automatically transmits technical information to us. This includes:

- Locale settings: Such as residency country, time zone, and interface language, to optimize your experience on our platform.
- Technical Data: Including IP address, browser type, operating system, access dates and times, and requested pages. This helps us ensure optimal functionality of our web, mobile, and desktop applications and improve the efficiency and usability of our services.

We also use web analytics tools and cookies to track website performance, monitor user behavior, and optimize marketing efforts. If you wish to restrict such data collection (to the extent possible and subject to legal obligations), you can submit a request to our support team using the contact details provided in the our contact details section. Please use the email address registered with your account. We will address your request within 30 business days.

## 3. About Cookies

A cookie is a small data file containing a unique identifier sent to your browser from a website and stored on your device. Cookies help track website usage and improve user experience. While most websites use cookies, they can only access the cookies they have sent to you, not those from other sites.

When you visit our Website, we automatically collect Technical Data, such as your browser type, IP address, and referring website. Cookies help us:

- Identify repeat visitors anonymously,
- Determine popular pages, and
- Enhance the Website's functionality and user-friendliness.

We prioritize your privacy by not storing personal details like names or email addresses in cookies. While cookies are an industry standard, you can configure your browser to block or delete cookies. However, doing so may limit your ability to use all features of our Website effectively.

## 4. HOW WE USE YOUR DATA AND THE LEGAL BASIS FOR PROCESSING

### 1. We process your data in accordance with applicable laws, which may be updated from time to time, for the following purposes:

- To fulfill our contractual obligations to you and provide the best possible service,
- To deliver our services efficiently,
- To comply with legal obligations, including fraud prevention and anti-money laundering measures, and

- To protect our legitimate interests and your vital interests.
- 2. We process your data based on the following legal grounds:
  - Compliance with legal obligations,
  - Performance of contractual obligations,
  - Safeguarding our legitimate interests, provided they do not override your fundamental rights and freedoms, and/or
  - Your consent.
- 3. Below is an overview of how we intend to use your data, the legal bases we rely on, and, where applicable, our legitimate interests. Please note that we may process your data for more than one lawful purpose depending on the specific context.
- 4. If you are an existing Client of the Website, we may process your personal data to communicate with you for support, send newsletters, push notifications, or calls to keep you informed about new features, news, events, and the full range of our services. This is done either based on our legitimate interest in maintaining communication with you or with your consent. We may also use your data to send you marketing materials about services we believe may interest you via email or other means.
- 5. Our Website is not designed for children, and we do not knowingly collect data related to individuals under the age of 18. Since we do not permit users under 18 to use our services, we require your date of birth to verify your age and ensure compliance with this policy.

## **5. OPTING OUT OF MARKETING COMMUNICATIONS**

If you prefer not to receive marketing newsletters or have your data shared with third parties for marketing purposes, you can email us at [support@catchline.io](mailto:support@catchline.io) using the email address registered with your account, requesting to stop receiving marketing communications or sharing your data with third parties for marketing purposes.

Once we receive your request or you update your preferences, we will cease sending you advertising content within 7 (seven) business days.

## **6. DATA DISCLOSURE**

1. We may share your data with third parties for the purposes outlined above. All affiliated and/or related companies of Catchline, as well as any third parties processing data on our behalf, are required to handle your data in compliance with the General Data Protection Regulation (GDPR) and applicable local laws, which may be updated from time to time. We take reasonable measures to ensure that third-party service providers do not use your personal data for their own purposes and only process it for specific purposes in accordance with our instructions.
2. Generally, your data is processed by Catchline's authorized processors. However, your data may also be transferred to another legal entity in the event of a business reorganization, sale of assets, consolidation, merger, or similar transaction.
3. Regarding the disclosure of data to entities outside Catchline's affiliated or related companies, we maintain strict confidentiality regarding client-related matters. We may disclose your data only under the following circumstances:
  - When legally required to do so,



- When you explicitly instruct us to process a transaction or service,
- When necessary to provide our services under our contractual relationship, or
- To protect our legitimate interests and comply with applicable laws.

#### 4. External Third Parties

Your data may be shared with the following third-party organizations/entities:

- **Service Providers:** We may share your data with trusted third-party service providers who assist us in operating, maintaining, and supporting our IT systems, websites, payment solutions, statistical analysis, marketing, advertising, newsletters, customer support, and other essential services.
- **Catchline Affiliates/Related Companies:** Your data may be disclosed to other Catchline affiliates and/or related companies to enable them to provide us with relevant services.
- **State Authorities:** The Company may disclose your details to official authorities if required by applicable law or court order. Such disclosures will be limited to the minimum extent necessary.
- **Other Disclosures:** In addition to cases where you have consented to data disclosure or where it is necessary to achieve the purposes for which the data was collected, we may disclose your data in special situations, such as: 1) Identifying, contacting, or taking legal action against individuals or entities causing harm to our rights, property, users, or others, or 2) Establishing, exercising, or defending legal claims.

#### 5. Third-Party Safeguards

Where reasonably possible, Catchline ensures that third parties collecting, storing, or processing personal information on our behalf:

- Sign agreements to protect personal information in line with this Privacy Policy and applicable laws,
- Sign non-disclosure or confidentiality agreements that include privacy clauses, and
- Implement procedures to comply with their contractual obligations to protect personal information.

In the event of misuse or unauthorized disclosure of personal information by a third party, remedial action will be taken promptly.

For further details about specific data transfers, please contact us using the registered email address associated with your account. Our contact information can be found in the our contact details section below.

## 7. DATA RETENTION

1. We retain your data for as long as necessary to fulfill the purposes for which it was collected, including meeting legal, tax, accounting, or reporting obligations. In certain cases, such as when there is a complaint or a potential for litigation related to our relationship with you, we may retain your personal data for a longer period.
2. To determine the appropriate retention period, we consider factors such as:
  - The volume, nature, and sensitivity of the data,

- The potential risk of harm from unauthorized use or disclosure,
  - The purposes for which we process the data and whether those purposes can be achieved through other means, and
  - Applicable legal, tax, accounting, and regulatory requirements.
3. We will retain your data (including call recordings) for the duration of our contractual relationship and for a minimum of 7 (seven) years after the termination of the Platform/Service used by the Client.
  4. For all other data, we generally retain it for 30 (thirty) business days after the termination of our services, unless there is a legal obligation requiring us to keep it longer.
  5. Once the retention period expires, your data will be permanently and irreversibly destroyed. We will also notify any third parties to whom the data was transferred and request that they take similar actions to erase the data.

## **8. YOUR RIGHTS: WITHDRAWING CONSENT AND UNSUBSCRIBING**

1. We require you to provide accurate, truthful, and up-to-date information about your identity and refrain from misrepresenting yourself as another individual or entity. If any of your identifying details change, you must notify the Company immediately, and no later than 7 days from the date of such changes. If your data is incorrect or incomplete, please contact our support team using the details provided in the our contact details section below to update your information.
2. Under applicable laws and our policies, you have certain rights regarding your data. These rights can be complex and may include exemptions, so we recommend contacting us (using the details in the our contact details section) for clarification. Below is a summary of your rights:
  - Right to Access: You have the right to confirm whether we are processing your data and to obtain detailed information about the data we hold and how it is processed. In some cases, you may also request a copy of this data. To request access to your data, please send an email from the address you used to register your Account to [support@catchline.io](mailto:support@catchline.io).
  - Right to Rectification: You can request corrections to inaccurate or incomplete data, considering the purpose of the processing.
  - Right to Erasure: You may ask us to delete or remove your data if there is no valid reason for us to continue processing it. To request the deletion of your Account and all associated data, please send an email from the address you used to register your Account to [support@catchline.io](mailto:support@catchline.io) with your request. Please note that we may not always be able to comply with erasure requests due to legal obligations, which we will explain at the time of your request.
  - Right to Restrict Processing: You can request that we restrict the processing of your data if: 1) The data is inaccurate, 2) The processing is unlawful, but you do not want the data erased, 3) You need us to retain the data even if we no longer require it, or 4) You have objected to the processing, and we are verifying whether we have overriding legitimate grounds to continue.

- Right to Data Portability: If the processing is based on your consent and carried out by automated means, you have the right to receive your data in a structured, commonly used, and machine-readable format. This right does not apply if it adversely affects others' rights or is technically unfeasible.
  - Right to Object: Depending on the legal basis for processing, you may object to the processing of your data. However, we may have compelling legitimate grounds to continue processing in certain cases.
  - Right to Withdraw Consent: If processing is based on your consent, you can withdraw it at any time. This applies to marketing purposes or sharing your data with third parties. Withdrawing consent does not affect the lawfulness of processing that occurred before the withdrawal.
  - Right to Complain: If you are dissatisfied with how we process or protect your data, please inform us so we can improve. You also have the right to lodge a complaint with the relevant data protection authority.
3. To exercise any of these rights or for more information, contact us using the details in the our contact details section. Provide your full name and email address to help us identify you and process your request promptly.
  4. We may need to request additional information to verify your identity and ensure your right to access or exercise other rights. This is a security measure to prevent unauthorized disclosure of your data.
  5. We aim to respond to legitimate requests within one month. If your request is complex or involves multiple actions, it may take longer, and we will keep you updated.
  6. For unreasonable, excessive, or additional copy requests, we may charge a reasonable administrative fee.

## 9. DATA SECURITY

1. We have implemented robust security measures to prevent your data from being accidentally lost, accessed or used without authorization, altered, or disclosed. Access to your data is restricted to employees, agents, contractors, and third parties who have a legitimate business need to know. These parties are required to process your data only in accordance with our instructions and are bound by strict confidentiality obligations.
2. We have established procedures to address any suspected data breaches and will notify you of a breach if legally required to do so.
3. Your cooperation is essential in keeping your data secure. During registration on the Website (or its mobile version), you will be asked to create a username and password for future logins, transactions, and use of our services. To protect your privacy and ensure secure operations, sharing your registration details (including your username and password) with others is strictly prohibited. The Company is not responsible for any damage or loss resulting from improper use, storage, or unauthorized access to your credentials, whether by you or a third party.
4. Any activity conducted using your username and password is solely your responsibility. The Company is not liable for such use, including verifying whether you are the one operating your account.



5. If you suspect unauthorized use of your account, you must immediately notify our client service team using the contact details provided in the our contact details section below.
6. Encryption of Data in Transit: We use strong encryption technologies, such as Transport Layer Security (TLS), to protect your data during transmission from your devices to our servers.
7. We prioritize developing services that are secure "by default." This means all new services and features are designed with stringent security requirements before development begins. This approach ensures the protection and privacy of all data handled and stored by our services.
8. To further secure your data, we use pseudonymization, allowing most services to operate without accessing your actual data. Instead, services use a system ID that cannot be traced back to you.
9. We store all equipment used for data processing in secure data centers, with network access isolated from the internet. Network segmentation ensures services with varying security levels are isolated. Logical access to your data is granted to employees on a "need-to-know" basis, ensuring only personnel requiring access for service provision can view it.
10. We are well-versed in modern data security threats and are equipped to combat them. Our infrastructure continuously monitors, analyzes, and responds to events, ensuring your data remains protected from threats, vulnerabilities, and malware.
11. In the event of a failure affecting data accessibility, we have backup and recovery procedures in place to restore your data quickly. Critical databases operate in high-availability mode to minimize downtime.
12. Employees who handle your data undergo regular training to understand and adhere to our data security principles. Access to your data is monitored and granted strictly on a "need-to-know" basis.
13. In the context of our business relationship, we may need to collect certain data as required by law or under the terms of our contract with you. Without this data, we may be unable to enter into or fulfill a contract with you, which could delay or prevent us from meeting our obligations or providing necessary services.
14. We generally do not use automated decision-making in our business relationships. If used in specific cases, we will inform you separately. In some instances, we may use profiling to evaluate certain personal aspects, and you will be notified accordingly. Any optional data collection will be clearly indicated at the point of collection.

## 10. OUR CONTACT DETAILS

If you have any questions about this Privacy Policy or wish to make a request regarding your data, please contact our support team using the details below.

The entity responsible for processing your data is **Catchline LLC**.

You can reach us at:

**Address:** Lighthouse Trust Nevis Ltd, Suite 1, A.L. Evelyn Ltd Building, Main Street, Charlestown, Nevis

**Email:** [support@catchline.io](mailto:support@catchline.io)

To help us process your request efficiently, please contact us using the email address registered with your Account. We may ask you to provide proof of identity, such as a valid form of identification, to ensure we protect your personal data from unauthorized access and comply with our security obligations.

If you have additional questions or need further details about how we use your data, feel free to contact us using the above information. We will be happy to assist you.

## **11. EXTERNAL WEBSITE LINKS**

Our Website may include links to third-party websites. These external sites are not under our control, and we are not responsible for the actions, content, or data practices of these third parties, including how they collect or handle your personal information. We encourage you to review the terms and conditions, as well as the privacy policies, of any third-party website before sharing your data.