



PRIVACY POLICY
AUGUST 2022

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1. Introduction

AC Global Ltd has developed the following Privacy Policy (the Policy) that covers the collection, use and disclosure of personal information, as well as the access to and correction of that personal information by the individuals concerned.

AC Global Ltd collects, processes, and discloses personal information about individuals in several circumstances. The collection, use, storage, disclosure, right of access and correction of personal information by AC Global Ltd is governed by this policy and provides on how the personal information is treated. These principles reflect internationally accepted standards for personal information handling.

2. International privacy scene

Seychelles laws are part of a world-wide picture of privacy protection. Privacy is protected as a human right at the highest international level.

UN instruments

The United Nations has adopted provisions or instruments that protect privacy. For example:

- Article 12 of the Universal Declaration of Human Rights.
- Article 17 of the International Covenant on Civil and Political Rights.

2.1 OECD and APEC

Several international bodies have developed more detailed guidelines for information privacy protection.

- OECD Guidelines on Protection of Privacy and Transborder Flows of Personal Data (1980)
- APEC Privacy Framework (2005)

2.2 APPA

Asia Pacific Privacy Authorities (APPA) - is the principal forum for regional privacy authorities to form partnerships and exchange ideas about privacy regulation, new technologies and the management of privacy enquiries and complaints.

2.3 Other international networks

There are also several other international meetings of privacy regulators which the Privacy Commissioner and his staff contribute to. These are:

- International Conference of Data Protection and Privacy Commissioners
- Global Privacy Enforcement Network (GPEN)
- International Working Group on Data Protection in Telecommunications (IWGDPT)

2.4 European Union General Data Protection Regulation (EU) 2016/679 (the GDPR)

As of May 2018, with the entry into application of the European Union General Data Protection Regulation, there is one set of data protection rules for all companies operating in the EU, wherever they are based. Stronger rules on data protection mean (a) people have more control over their personal data and (b) businesses benefit from a level playing field and these harmonized data protection laws across the EU.

3. AC Global Ltd' obligations

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through this website <https://acforex.sc/>. In this Privacy Policy we, us or our means AC Global Ltd. When we collect, store and use your personal information, we do so in accordance with the rules set down in Seychelles. We are committed to being open and transparent about how we use your personal information.

AC Global Ltd complies with the legislative obligations and is committed to protecting privacy of its customers and staff. AC Global Ltd has a responsibility to ensure that its employees adhere to the Policy and is responsible for any actions an employee takes in the course of their employment, or if an employee uses personal information they obtained in the course of their employment. However, AC Global Ltd will do everything reasonable to prevent its employees from acting in this way. In such cases, the individual may be held directly liable.

AC Global Ltd is responsible for the personal information it holds directly and all personal information that it provides to any third party acting on its behalf. If AC Global Ltd must give information to someone else to allow a service to be provided, it will do everything reasonable within its power to prevent the unauthorized use or disclosure of that information by the recipient. The secure destruction of documents should be a condition of the contract.

4. Personal information

Personal information: The types of personal information or personal data we may collect about you include:

- Your name, your title;

- Your contact details, including email address, mailing address, street address and/or telephone number;
- Your age and/or date of birth;
- Your drivers' license number;
- Your employment details;
- Your taxation details;
- Financial information including your average taxable income for the last three years, your statement of income, assets and liabilities;
- Trading statements;
- Details of your nominated bank account;
- Your preferences and/or opinions;
- Information you provide to us through customer surveys;
- Details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- Your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behavior;
- Information about your access and use of our Site, including using Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- Additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- Your signature, whether wet or electronic. This will be stored electronically.
- Any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you or from third parties.

5. Collection and use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our website, associated applications and associated social media platforms;

- to contact and communicate with you;
- for internal record keeping, know your customer and administrative purposes;
- for analytics, market research and business development, including to operate and improve our Site, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- to consider your employment application.

AC Global Ltd will be responsible to make available personal information if required to Seychelles Authorities as permitted by law.

6. Legal bases for processing (for European Economic Area users):

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable European Union laws. The legal bases depend on the services you use and how you use them. This means we collect and use your information only where:

- we need it to provide you with our services, provide customer support and personalised features and to protect the safety and security of our services;
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose; or
- we need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services.

7. Disclosure of personal information to third parties

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, webhosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors, payment systems operators and credit reporting agencies (CRA);
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- sponsors or promoters of any competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred.
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services, or direct marketing to you. This may include parties located, or that store data, outside of Seychelles; and
- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Seychelles.

The third party will only process your personal information in accordance with written instructions from us. When we refer to 'processing' in this clause and this Privacy Policy in general, we mean any operation or set of operations which is performed on personal information, whether or not by automated means, such as collecting, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available personal information.

By providing us with personal information, you consent to the disclosure of your personal information to third parties who reside outside Seychelles and, if you are an individual located in the EEA, to third parties that reside outside the EEA.

Where the disclosure of your personal information is solely subject to Seychelles privacy laws (and not subject to the GDPR), you acknowledge that some third parties may not be regulated by the Seychelles privacy laws and if any such third party engages in any act or practice that contravenes, it would not be accountable under Seychelles privacy laws, and you will not be able to seek redress.

Where the disclosure of your personal information is subject to GDPR, you acknowledge that there are risks if the third party outside the EEA engages in any act or practice that would contravene the GDPR and where there is no adequacy decision in place with the country outside the EEA or appropriate safeguards in place with the third party.

8. How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Seychelles law. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

We do not currently collect sensitive information from you. However, if we do so, we will not collect sensitive information from you without first obtaining your consent.

Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected.

Sensitive information may also be used or disclosed if required or authorized by law.

9. Our responsibilities as a 'controller' under the GDPR

Controllers are defined by the GDPR as natural or legal persons, a public authority, agency or other body to which personal information or personal data has been disclosed, whether via a third party or not, and who determines the purposes and means of processing personal information. We are a controller under the GDPR as we collect, use and store your personal information to enable us to provide you with our goods and/or services.

As a controller, we have certain obligations under the GDPR when collecting, storing, and using the personal information of individuals based in the EEA. If you are an individual located in the EEA, your personal data will:

- be processed lawfully, fairly and in a transparent manner by us;

- only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;
- be collected in a way that is adequate, relevant and limited to what is necessary in relation to the purpose for which the personal information is processed.
- be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);
- be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected;
- be processed securely and in a way that protects against unauthorized or unlawful processing and against accidental loss, destruction or damage.

We also apply these principles to the way we collect, store, and use the personal information of our Seychelle customers or clients.

Specifically, we have the following measures in place, in accordance with the GDPR:

- **Data protection policies:** We have internal policies in place which set out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.
- **Right to ask us to erase your personal information:** You may ask us to erase personal information we hold about you.
- **Right to ask us to restrict data processing:** You may ask us to limit the processing of your personal information where you believe that the personal information, we hold about you is wrong (to give us enough time to verify if the information needs to be changed), or where processing data is unlawful and you request us to restrict the processing of personal information rather than it being erased.
- **Notification of data breaches:** We will comply with the GDPR in respect of any data breach.

10. Your rights and controlling your personal information

- **Choice and consent:** Please read this Privacy Policy carefully. By providing personal information to us, you consent to us collecting, holding, using, and disclosing your personal information in accordance with this Privacy Policy. You must be 18 years and over to use our Site. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.
- **Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing

personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

- **Restrict:** You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict how we process your personal information, we will let you know how the restriction affects your use of our Site or products and services.
- **Access and data portability:** You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the personal information we hold about you at any time. You may also request that we transfer this personal information to another third party (data portability). However, it is a legislative requirement that we keep all personal information and records for a period of 7 years from the date you close your account with us. Should you cease to be a client of ours, we will maintain your personal information.
- **Correction:** If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.
- **Complaints:** If you believe that we have breached the Seychelles privacy laws or an article of the GDPR and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact the Seychelles authorities if you wish to make a complaint.
- **Unsubscribe:** To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

11. Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures such as the pseudonymization and encryption of personal information, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorized access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorized disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

12. Cookies and web beacons

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behavior and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see <https://policies.google.com/technologies/partner-sites> or any other URL Google may use from time to time.

13. Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

14. Amendments

We may, at any time and at our discretion, vary this Privacy Policy. We will notify you if we amend this Privacy Policy by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change.

For any questions or notices, please contact our Support team at:

Espace Building, Unit No. G2, Victoria, Mahe, Seychelles

Email: support@acforex.sc