# **Privacy Policy**

This Privacy Policy describes Jet Corp LLC policies and procedures on the collection, use, and disclosure of Your information (including personal data) when You use the Jetvix Trading Platform through the website jetvix.com (hereinafter the "Website") and/or the Jetvix Mobile Application and tells You about Your privacy rights and how the law protects You. All further references to the Website and the Jetvix Mobile Application are equivalent.

This Privacy Policy is an integral part of the Jetvix Client Agreement.

The information You provide is collected and processed by Jet Corp LLC, a company registered in accordance with the laws of Saint Vincent and the Grenadines with registration number 2823 LLC 2023, located at Ginger Village, Belmont, Kingstown, St. Vincent and the Grenadines (hereinafter - the "Company," "We," "Us," or "Our"), providing access to the Jetvix Trading Platform.

We assure You that We take all measures necessary to ensure the confidentiality of the personal data that You provide to Us.

We encourage You to carefully read this Privacy Policy. By registering on the Website and/or the Jetvix Mobile Application , You fully and unconditionally agree to its terms.

# Interpretation

The words of which the initial letter is capitalized have meanings defined under the following definitions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

#### Terminology

For the purposes of this Privacy Policy:

**'Cookies'** mean small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website.

'You' means the individual accessing or using the Jetvix Trading Platform.

Any other terms are interpreted in accordance with the Jetvix Client Agreement.

# 1. The Information You Provide to Us

1.1. Like most websites, We use Cookies.

Some Cookies are necessary for the normal operation of the Website and are used without obtaining Your additional permission. These files include the following:

- Cookies needed to identify the source from which the transition was made to the Website;
- Cookies containing Your session ID on the Website.

We also collect and process data about Your device, including the IP address (Internet Protocol address), browser type, browser version, browser configuration (hereinafter — the **«Usage Data»**).

1.2. When registering on the Website, We ask You to provide Us your email address. In the future, You have the option to enter Your first and last name, date of birth, gender, phone number, and country in Your Personal Account on the Website.

1.3. When crediting an Account on the Trading Platform, Our partners (financial institutions and Payment System Providers) receive and process information containing Your payment details, including the bank card number, its expiration and CVC/CVV code, information on the credit/financial institution and/or the issuer, and other data depending on the means of payment, as well as Your first and last name. Also, upon the request of the payment system or Payment System Provider, We may provide them with data from Your passport or other identity document, email address and phone number (in the event this data is indicated in Your Personal Account).

Payment System Providers process such information during the period of Your use of the Company's services and delete it upon achieving the processing goals, unless the law requires or allows for the establishing of a longer period for the storing of such personal data.

A prerequisite for Our cooperation with Payment System Providers is that they fulfill the requirements of the General Data Privacy Regulation (GDPR).

1.4. As part of verification, We request You to provide a photo of:

- passport or ID card;
- cards/screenshots of wallets;

with the documents specified above in Your hand.

In order to comply with the laws on countering the legalization of illegally obtained funds, the Company may require You to submit additional documents such as:

- utility bill;
- bank reference letter;
- bank statement letter;
- documents confirming source of income (for example, salary, sale of property, loan,

inheritance);

- 2nd ID document.

We may also request Your scanned copies of bank cards, or other documents if the documents provided earlier do not fully identify You and/or verify Your payment details.

Verification procedures are described in more detail in the Jetvix Client Agreement.

1.5. We collect and store data on Your financial activity and other actions on the Jetvix Trading Platform, as well as information contained in web server reports (including the interface language, browser type, and date and time of the last visit).

1.6. From time to time, We may ask You to fill out questionnaires in order to improve the quality of service, for statistical purposes, or to comply with applicable laws. Sometimes when filling out a form You will be asked to provide Your name and email address.

1.7. When contacting the Company's Support Service, We ask You to include Your first and last name, and email address.

1.8. In order to comply with international legislation on countering the laundering of proceeds from crime (Anti-Money Laundering), and adhering to the principle of KYC, We are entitled to ask You for other information and data, the list of which is established by relevant laws, including information about the sources of your income.

1.9. We collect and process Your personal data only in the following situations:

1.9.1. It is necessary in order to conclude the agreement on the provision of services (Client Agreement) in accordance with Your request and its further execution.

1.9.2. You have given Us Your consent to the collection and processing of such data, including through the acceptance of the terms of the Client Agreement and the Privacy Policy when registering on the Website and/or the Jetvix Mobile Application .

1.9.3. Such collection and processing is necessary in order to comply with the requirements of applicable law.

1.9.4. Such collection and processing is due to our legal interests, while We always strive to maintain a balance between Our legal interests and the confidentiality of Your personal data.

Kindly note that in most cases, if You do not provide the necessary information, We cannot provide You with the service You have requested.

2. How We Use the Information You Provide

2.1. The information we receive about You allows Us to provide quality services, develop Our existing services, and create new ones.

2.2. Your data obtained using Cookies and similar tools ensures the functionality of the Website and improves the quality of the services provided.

2.3. The data collected when visiting the Website are necessary for the operation of the Jetvix Trading Platform and its subsequent analysis, as well as to provide You with information in the most convenient way for You.

For example, such data makes it possible to determine the language of the Jetvix Trading Platform user interface.

2.4. The data provided during registration and verification (including last name, first name, middle name (if any), gender, date of birth, nationality, and email address) are used to contact You and to provide You with the most accurate and personalized information.

Moreover, the data obtained by Us during verification (including information from Your bank documents) is necessary to ensure the legality and security of the Company's services.

2.5. Information about Your financial activity and other activity on the Jetvix Trading Platform, as well as information from web server reports, is used to protect Your funds and block scammers from accessing Your Account.

2.6. We may use the information You provide, including your name, and email address, in order to send You system notifications and advertising materials via methods not prohibited by applicable law.

You have the right to unsubscribe from the Company's mailing list and call at any time by clicking on the "Unsubscribe" link in an email from the Company, or contacting the Company's Support Service. We are committed to promptly responding to Your request to unsubscribe from all types of emails (except for transactional notifications).

2.7. From time to time, We may send notifications about changes in the operation of the Website or the terms of service provision to Your email address.

2.8. Moreover, We need your data in order to personalize the content of the Website and show You relevant advertising.

2.9. The data You provide when contacting the Company are necessary in order to establish the circumstances of Your appeal and provide a complete answer in the shortest possible time.

In the event We need to use the information provided for other purposes, We always ask for Your consent.

In the event of automated processing of personal data, We ensure that such processing does not have any impact on You.

3. Retention of Your Personal Data

We will retain Your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your personal data to the extent necessary to comply with Our legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

Personal data that We process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

# 4. Your Rights

4.1. Your principal rights towards your personal data are:

#### (a) The right to access

This enables You to receive a copy of the personal data We hold about You;

#### (b) The right to rectification/correction

This enables You to have any incomplete or inaccurate data We hold about You corrected, though We may need to verify the accuracy of the new data You provide to Us;

#### (c) The right to erasure

This enables You to ask Us to delete or remove your personal data where there is no good reason for Us continuing to process it;

#### (d) The right to restrict or object to processing

This enables You to initiate the suspending of the processing of your personal data;

#### (e) The right to withdraw consent

However, this will not affect the lawfulness of any processing carried out before You withdraw Your consent.

4.2. This list of rights is not complete and may include other rights established by applicable law.

Please note that Your right to demand that We suspend or terminate the processing of your personal data and/or delete them is not absolute and may be limited by applicable law, including (but not limited to) the requirements of AML & KYC legislation.

In addition, in some cases exercising this right may serve as a basis for termination of services provision to You.

# 5. Transfer of Your Personal Data

5.1. Your information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of Your jurisdiction.

5.2. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

5.3. The Company will take all steps reasonably necessary to ensure that Your data are treated securely and in accordance with this Privacy Policy and no transfer of Your personal data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

# 6. Disclosure of Your Personal Data

6.1. Your personal data may be disclosed for the following purposes:

## 6.1.1. Business transactions

If the Company is involved in a merger, acquisition or asset sale, Your personal data may be transferred. We will provide You with notice before Your personal data are transferred and becomes subject to a different Privacy Policy.

#### 6.1.2. Law enforcement

Under certain circumstances, the Company may be required to disclose Your personal data if required to do so by applicable law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### 6.1.3. Other legal requirements

The Company may disclose Your personal data in the good faith belief that such action is necessary to:

- comply with a legal obligation; or
- protect and defend the rights or property of the Company; or
- prevent or investigate possible wrongdoing in connection with the using of the Jetvix Trading Platform; or
- protect the personal safety of Our clients; or
- protect against legal liability.

# 7. The Information We Provide to Third Parties

7.1. We do not share Your personal data with third parties who are not affiliated with Your activity on the Website.

7.2. Third parties to whom We may transfer Your personal data process them on Our behalf and strictly in accordance with Our requirements, instructions, and this Privacy Policy. Such third parties may be:

1) a limited number of Our employees and employees of Our affiliates;

2) professional auditors;

3) professional dispute resolution organizations;

- 4) payment systems;
- 5) Payment System Providers;
- 6) verification service providers;

7) service providers that significantly affect the performance and operation of the Jetvix Trading Platform.

7.3. For promotional purposes, as well as for statistics generation, We provide information that does not contain Your personal data to:

## **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our service. These data are shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <u>https://policies.google.com/privacy?hl=en</u>

#### Google Firebase

Google Firebase is an analytics service offered by Google that tracks and reports applications traffic and information about application failures and technical data about the user's device. Google uses the data collected to track and monitor the use of our service. These data are shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <u>https://policies.google.com/privacy?hl=en</u>

# AppsFlyer

AppsFlyer is a web analytics service that uses technical information about the operating system, device type, typically derived from a browser or other device, for attribution and marketing analytics that allow you to measure and analyze the effectiveness of your marketing campaigns by understanding which marketing campaigns contributed to the download/installation of your mobile apps or other conversion rates, also help detect and defend against fraudulent behavior associated with their marketing campaigns

For more information about Google's privacy practices, please visit the Services Privacy Policy webpage: <u>https://www.appsflyer.com/legal/services-privacy-policy/</u>

## CloudFlare

CloudFlare is the cloud service to transfer and store information, including Your personal data. Moreover, such information is hosted on servers in the European Union and the United States of America.

For more information on the privacy practices of CloudFlare, please visit the CloudFlare Privacy web page: <u>https://www.cloudflare.com/privacypolicy/</u>

#### Zendesk

Zendesk is the service (system) that tracks, prioritizes, and executes tickets assigned to such requests. Therefore, if You contact Our Support Service, Zendesk service gets access to Your personal data provided upon request.

For more information on the privacy practices of Zendesk, please visit the Zendesk Privacy web page: <u>https://www.zendesk.com/company/agreements-and-terms/privacy-policy/</u>

7.4. In order to properly provide the functionality of the Jetvix Trading Platform, We use the services of Devexperts LLC (Isle of Man), registration number: 000686L, which processes the necessary technical information of the Jetvix Trading Platform through the provision of services, including information about your email address.

For more information on the privacy practices of Devexperts LLC, please visit the Devexperts LLC Privacy web page: <u>https://devexperts.com/privacy-policy/</u>

7.5. We may also transfer information to countries outside the European Economic Area. The level of protection of personal data in these countries may vary.

However, Our partners in such jurisdictions are always bound by contractual obligations to maintain an adequate level of protection of the transmitted data, and We take all possible measures to ensure the confidentiality of the information You provide.

In the event the Company participates in mergers and acquisitions transactions, it may be necessary to transfer Your personal data to Our future partners, and We guarantee the confidentiality of that data.

7.6. With Your prior consent, We may provide information about You to companies, organizations, or individuals not listed in this Privacy Policy.

# 8. Technical Information Protection

8.1. To ensure the security of information You provided, We have implemented special rules and technical measures to protect information.

8.2. We use a Secure Sockets Layer (SSL) encryption system for transmitted data. Accordingly, all operations carried out on the Website are well protected.

# 9. Passwords

9.1. When registering on the Website You specify Your email address and set Your own password for your Account.

9.2. We do not have the right to make changes to such data and cannot be held responsible for how You ensure its confidentiality.

9.3. We ask You to immediately report any unauthorized or other suspicious activities related to the use of your Account.

10. The Use of Services by Minors

10.1. The Website is an open resource, but is not intended for use by persons under the legal age in accordance with applicable law.

10.2. In the event that We become aware that a minor has provided or attempted to provide their personal information to register on the Website, We delete such information from the Company's servers.

# 11. Changes

11.1. From time to time, We may make changes to this Privacy Policy, but the content of such changes will never limit Your rights with respect to Your personal data to a greater extent than is established by applicable law.

In the event of changes, they enter into force from the moment of posting the amended text of the Privacy Policy on the Website, unless a different deadline is specified for the changes to enter into force. We inform You of such changes via email.

11.2. If You do not agree to the amended edition of the Privacy Policy, We ask you to stop using the Website and block Your Account by contacting Our Support Service using the contacts listed in the Jetvix <u>Client Agreement</u>, having previously Withdrawn the Funds from Your Account on the Jetvix Trading Platform.

# 12. Contacts

If You have any questions or would like to receive additional information regarding the processing of Your personal data, to check what is being processed, or to withdraw Your consent to such processing, You can contact us: <u>dataprotection@jetvix.com</u>.

Effective January 23, 2023