



PRIVACY POLICY

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1. INTRODUCTION

Rock - West is responsible for the protection of the privacy and the safeguarding of clients' personal and financial information. By opening a trading account with Rock - West, the client hereby gives its consent to such collection, processing, storage and use of personal information as explained below.

As part of our daily business operations, we need to collect personal data from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services, as well as when providing them with the respective information

This Privacy Policy (the "Policy") describes how your personal information is collected, used, shared or otherwise processed, when you visit our Company's website, i.e. www.rock-west.com (the "Website") or decide to use any service available through the Site, or apply to be provided with any investment services or products we are authorized to offer or through a third party in connection with our provision of services to you.

This Policy applies to the processing activities performed by the Company to the personal data of its clients/potential clients and website visitors. This Policy does not apply to websites operated by any other organizations and/or other third parties.

We are dedicated to protecting your confidentiality and privacy of your personal data and handling your personal data in a transparent manner. Our Company is committed to ensuring that we collect, use, share, disclose or otherwise process personal data in accordance with the requirements described in this Policy.

2. DEFINITIONS

For the purposes of this Policy:

- Cookies: are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>
- Personal data: means any information that could be used, on its own or in conjunction with other data, to identify an individual, directly or indirectly, such as name, identification number, location data, etc.
- Processing: means any operation or set of operations which is performed on personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, erasure or destruction.

3. COLLECTION OF PERSONAL DATA

During the account opening process for a demo or a trading account, the client is requested to provide to the Company some personal information. The provision of the information submitted by the Client will enable the Company to evaluate the application pursuant to the applicable laws and regulations governing

the provision of the services. The same information will also be used by the Company to contact the client regarding the offered services.

The Personal Data collected by the Company might include the client's name, surname, address, e-mail address, phone number; date of birth, gender, nationality; occupation and employment details; financial information such as income, assets and net worth, source of funds; tax relevant information; IP address and other location data; bank account information, e-wallets and credit card details; documents that the client has to provide for verification of its identity, such as passport/identity card, utility bills and/or bank statement and historical data of client's transactions including, trading history or investments company incorporation details and other supporting documents if the applicant is a legal entity.

MINORS

The Company's services are not available to individuals who are under the age of eighteen (18) ("Minors"). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us. If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a Minor has shared any information with us, please contact us at support@rock-west.com.

HOW WE OBTAIN YOUR PERSONAL INFORMATION

We obtain this information in a number of ways through your use of our services including through any of our website, apps, the account opening applications, our demo sign up forms, subscribing to our newsletter and from information provided in the course of ongoing customer service communications. We may also collect this information about you from third parties when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies (i.e. Thomson Reuters Database, Department of Registrar's website, etc.). Also, we may collect information about you, when you use or connect to the Company by or through a third-party platform (i.e. LinkedIn, Facebook or other sites) you allow us to access and/or collect certain information from your Third Party Platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform.

We also keep records of your trading behaviour, including records regarding:

- products you trade with us and their performance;
- historical data about the trades and investments you have made, including the amount invested;
- your preference for certain types of products and services.

We may ask for other personal information voluntarily from time to time (for example, through market research or surveys). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We shall record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations shall be recorded without the use of a warning tone or any other further notice. Further, if you visit any of our offices or premises, we may have CCTV which will record your image, which we may have for security reasons.

PERSONAL INFORMATION COLLECTED AUTOMATICALLY

When you access or use our Services, we automatically collect information about you, including:

- Log Information

We collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.

- Device Information

We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

- Activities on Website

We collect records of activities on the Website, including, any content you post, your account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.

- Location Information

In accordance with your device permissions, we may collect information about the precise location of your device.

- Information Collected by Cookies and Other Tracking Technologies.

We may collect some of the Cookies that are already installed on your device. We use different technologies to collect information, including Cookies, web Beacons and Log files.

4. USE OF PERSONAL DATA

The Company collects and processes personal data which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the Client. In some cases, the Company may also process the client's personal data to pursue its legitimate interests or those of third

parties, provided that the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

In view of the above, the Company may use client's personal information for one or more of the following purposes to confirm/verify its identity; to process transactions; trading account management; for internal business as well as record keeping purposes; to analyse statistical data; to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation; to defend possible legal claims and/or comply with court orders, judicial processes and or any other requirements of a competent authority;

The Company also needs to comply with the Anti-Money Laundering regulations therefore there are documents that must be kept to be able for the Company to demonstrate to the authorities that it has acted in accordance with the legislation.

If there is no lawful basis for the usage of client's personal data as indicated above, the client's consent will be required.

Notwithstanding the above, the Company may use information for the following purposes (list not exhaustive):

- Provision of the Services under this Agreement
- For KYC and due diligence purposes i.e. verification of identity
- For maintenance and management of the Client's account as well as administration of the services provided to the Client
- Communication with the Client when necessary or appropriate
- Compliance with legal and regulatory requirements

5. SHARING AND TRANSFER OF PERSONAL INFORMATION

The Company may share client information with business partners and suppliers with whom it may have outsourced certain of the Company's business functions or cooperating with. Personal data collected by the Company may be transferred or disclosed to third party contractors, subcontractors, for the purposes for which the Client has submitted the information i.e. agreements with Service Providers such as providers assisting during the onboarding of clients for the performance of the client's KYC and Due Diligence as well as processing of funds.

In order to provide services to the client the Company may be required to transfer client's personal information to parties located outside of Seychelles i.e. in the European Economic Area or in countries which may not have an equivalent level of data protection laws as in the EU. Where this is the case the Company will take reasonable steps to ensure the privacy of the client's information. By submitting personal information, the client agrees to the aforesaid transfer, storage and processing of the client's information.

The Company may also share information with affiliates or any other company in the same group of the Company in the event such information is reasonably required in order to provide the products or services

to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so. In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducers.

All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

6. DISCLOSURE OF PERSONAL DATA

The Company shall not disclose to a third party, any confidential information unless it is required to do so by a regulatory authority of a competent jurisdiction, the provisions of applicable laws and regulations, there is a legitimate interest for such disclosure or duty to do so the client has requested from the Company to proceed with a disclosure and/or the client has consented to; such disclosure shall occur on a 'need-to know' basis, unless otherwise instructed by a regulatory authority. Provided that such disclosure takes place, the Company shall expressly inform the third party regarding the confidential nature of the information.

7. COOKIES

The Company uses cookies to gather information about client's access to the Company's website www.rock-west.com and other services the Company provides to the client.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated companies. It is noted that the information collected by such companies is not personally identifiable. To administer and improve the services offered by the Company's website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Most internet browsers are set up to accept cookies. If the client does not wish to receive cookies, he/she may be able to change the settings of the browser to refuse cookies or have the choice whether to accept a cookie or not. However, it is strongly recommended that the client allows cookies on the Company's website to ensure he/she has the best possible experience. Turning off cookies may result in reduced performance of the website and trading platform and may also impair the quality of the services that the Company provides in relation to the client's trading account.

8. AMENDMENTS TO POLICY

The Company reserves the right to make changes to this Privacy Policy from time to time for any reason and the client will be notified of such changes by posting an updated version of this Privacy Policy on the website. The client is responsible for regularly reviewing this Privacy Policy and the use of this website after any such changes are published, shall constitute an agreement to such changes.

9. LEGAL DISCLAIMER

The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's site(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of client's personal information due to misuse or misplacement of any passwords, negligent or malicious.

10. COMMUNICATION WITH THE COMPANY

Further information on the Company's Privacy Policy is available upon request. The Company's contact details are:

Email: support@rock-west.com

Address: 2nd Floor, 9A, CT House, Providence, Mahe, Seychelles