

# **Privacy Policy**

#### **CONTENTS**

- 1. Introduction
- 2. Collection of Data
- 3. Use of Data
- 4. Protection of Data
- 5. Cookies
- 6. Customer Consents & Rights

#### 1. Introduction

Protecting customers' personal information is a key responsibility and obligation of Gilgamesh Financial Services and/or GFX Securities and/or the Company (referred to as the "Company"). This Privacy Policy outlines the procedures for collecting, protecting, storing, and using customers' personal data.

### 2. Collection of Data

The Company collects personal data provided by customers explicitly and knowingly. To open an account on the Company's trading platform, customers must provide the following Personal Data:

- Full name
- Residential address
- Employment details
- Average income
- Other personal details (as necessary and upon request)

### 3. Use of Data

The Company may process customers' Personal Data on the following bases and for the following purposes:

- To fulfill obligations arising from any agreements between the customer and the Company.
- To notify customers about changes to products and/or services, as well as other significant alterations affecting the performance of an agreement between the customer and the Company.



• To inform customers about products and/or services of the Company, provided that the customer has given explicit consent to receive such information.

If customers are required to provide Personal Data to comply with legal requirements or to conclude an agreement with the Company, the purpose of collecting Personal Data will be made evident, and the Company will advise customers accordingly.

# 4. Protection of Data

The Company will retain customers' Personal Data for a period determined at its discretion. The data will be used to update customers about the Company's products and/or services. Customers have the right to request the cessation of such updates by informing the Company of their intent.

The Company is committed to making every effort to ensure the security of personal data and other confidential information received from customers, adhering to internal rules for the use of such information.

The Company may share Personal Data with the following categories of recipients:

- Any Group Company: Personal Data may be shared with any member of our group, including any
  subsidiary or holding company, to provide customers with or administer products, services, and
  support. All employees and contractors are required to follow our privacy and security policies when
  handling personal data.
- Third-Party Service Providers: Personal Data may be shared with third-party service providers to support the Company's products and services, such as system maintenance, customer due diligence, credit checks, feedback collection, marketing, and data analytics. These providers are only permitted to use Personal Data for the purpose of providing services to the Company.
- Fraud Prevention and Credit Reference Agencies: Personal Data may be shared with third-party service providers to conduct anti-money laundering checks, fraud prevention, sanctions, and credit risk assessments.
- Introducers and Advisers: Personal Data may be disclosed to an introducer if they directed the customer to the Company.
- Courts, Regulators, and Law Enforcement Agencies: Personal Data may be shared when necessary to
  comply with legal or regulatory obligations, including responding to government authorities, such as
  law enforcement or financial regulators. This may include authorities outside the customer's country
  of residence.



• Other Third Parties: Personal Data may be shared in the event of a merger, sale, restructure, acquisition, joint venture, or other disposition of the Company's business, assets, or stock.

Personal Data is stored electronically on the Company's servers. When Personal Data is no longer required, it will be securely destroyed or deleted to prevent unauthorized access during and after the destruction/deletion process.

Customers are responsible for maintaining the confidentiality of their user ID and login information.

#### 5. Cookies

The Company uses Cookies on its website. Cookies are small files stored on a user's computer, designed to hold data specific to a particular client and website. They can be accessed by the web server or the client computer. Cookies may be used on certain pages of the website to provide users with a more customized web browsing experience.

# 6. Customer Consents & Rights

By accessing the Company's website, customers consent to the collection, use, maintenance, and disclosure of their personal data in accordance with the provisions of this Privacy Policy.

Customers have the following rights:

- To request and obtain a copy of the Personal Data held by the Company.
- To request the amendment and/or correction of any incorrect or incomplete data. The Company is obliged to fulfill such requests and notify any relevant third parties to whom the data was transmitted.
- To request that the Company stops processing their Personal Data. Customers acknowledge that refusal to process their Personal Data may affect the provision of some of the Company's services.
- To request the erasure of Personal Data from the Company's records. The Company will comply unless there is a lawful reason not to do so.
- To lodge a complaint with the supervisory authority. However, the Company prefers that customers contact them first to try to resolve the complaint and investigate potential causes for future complaints.