

Privacy Policy

Capital Rise Solutions LLP (CRS LLP)

- Policy Statement CRS LLP (“CRS LLP”, “we” and “us”) and our affiliates respect customer privacy and are committed to protecting it. The purpose of CRS LLP’s Privacy Policy is to explain CRS LLP’s privacy policy and practices and how customer personal data (“Personal Information”) is collected, used, disclosed and maintained by us. We will be the data controller of such Personal Information and will process your Personal Information in accordance with our Privacy Policy.

The use and/or purchase of any of our services is subject to the applicable terms. The use of our website is subject to our website terms of use and this Privacy Policy is incorporated into and forms part of those terms.

- Personal Information CRS LLP Collects The term "Personal Information" includes information about an identifiable individual. It may include unique details about the individual such as the individual’s name, address, age, and personal identification numbers including those contained in government issued identification, such as a driver's license or passport.

CRS LLP collects Personal Information about our customers from the following two main channels:

1. Website, Account and General Communications

In order to provide materials and services to you, when you visit our website, request materials from us, register for events, or contract with us, we will collect data from you. We will receive your information in these circumstances, including, for example:

- Visiting and using our website
- Account Application Forms and other documents and data submitted by customers, including, and not limited to, customer name, residential address, government issued ID numbers (such as social security numbers), date of birth, employment information, investment experience, annual income, and estimated net worth
- Customer Transactions with CRS LLP such as ordering our products/services, account deposits and withdrawals that require customers to provide bank account information
- Communications with CRS LLP including those with customer service representatives and our Live Chat service (“LiveChat”), CRS LLP’s online customer service help portal.

We refer collectively to these interactions as “Website Services”. We explain below how

we collect and use your information collected through the Website Services.

2. Platform

If you request access to our CRS LLP trading platform and payment portal (the “Platform”), we will also collect information about your use of the Platform. The information collected through the Platform will include usage, performance, analytic and metadata and some of this may include your Personal Information. This does not include the CRS LLP demo account (which falls within the scope of our Website Services).

CRS LLP does not collect more Personal Information than is required to open and operate customers’ accounts, and to comply with regulatory compliance and other legal obligations.

Website, Account and General Communications

What We Collect

We (or third parties acting on our behalf) may collect your information, including your Personal Information, when providing the Website Services including:

- Name
- Email
- Address
- Phone Number
- Country of Residence
- Date of Birth/Age
- IP address.

Platform What We Collect We (or third parties acting on our behalf) may collect your information, including your Personal Information, when providing access to the Platform including:

- Name
- Email
- Address
- Phone Number
- Country of Residence
- Date of Birth/Age
- Tax Identification Number
- Income
- Income Source
- Level of liquid savings and investment
- IP address
- Employment Status
- Employer Name
- Industry

- Trading Experience
- Criminal and or civil offenses by way of a background check
- Government Identifiers and documents containing information, such as: Social Security Number/Passport Number & Passport Expiry (which we electronically verify);
- Password; and
- Educational details. C. How CRS LLP Uses Personal Information We may hold and retain information about you for various purposes:

1. Website, Account and General Communications Some of the information we collect from you is necessary to enable us to deliver the Website Services to you in accordance with our terms, and sometimes we are required by law and regulations to collect and process this information about you. At other times, we consider it is in our legitimate business interests to collect and process this information, taking into consideration your privacy rights. We may use your information to:

- Fulfill your orders or respond to requests you make in connection with providing the services under our terms with you
- Provide you with a response pursuant to your request and your agreement with the applicable terms, we will collect and use Personal Information including your name and email address
- Provide our Website Services to you, including access to a demo account or support through our LiveChat function. In order to perform the Website Services under the contract between you and CRS LLP, we have to collect certain Information from you such as your name and contact details. Without this information, we may not be able to deliver the services which you request from us.
- Improve and develop the Website Services We look for ways to innovate and advance our Website Services. We will use Information about how you use the Website Services, including how you interact with various aspects of the Website Services, the duration for which you use the Website Services and content that is of interest to you, in order to do this. It is in our legitimate business interests to use Personal Information in this way to improve Website Services
- Send administrative information, changes to contract terms or policies Where we make updates to terms and policies we are required under certain laws and under our contract with you to notify you of these changes. Other administrative communications may be necessary in order for us to perform our obligations under the contract with you, or may be sent out in line with our legitimate business interests.
- Send marketing communications like product announcements, educational materials or upcoming online or offline events, where you have not objected to receiving these or with your consent where required. This may also include inviting you to participate in various promotional activities and consumer research surveys. It is in our legitimate business interests to generate growth for our own business to ensure we continue to generate development for our company and drive sales of our products and services. We will carry out marketing campaigns and research surveys in accordance with applicable laws.
- Research and analyze how our Website Services are used via cookies, web beacons and other similar technologies to personalize the Website Services. (For more information about our use of cookies and your choices to opt out of their use, see “Cookies” at section H below.) We use

your information in our legitimate business to understand how you interact with our Website Services and to deliver relevant content to you online.

- Diagnose and fix technical issues and monitor the security of our environments. We need to understand how our Website Services are performing in order to prevent and address any issues that may present themselves with regard to technical and security operations. We may process your Personal Information for this purpose in our legitimate business interests to protect the integrity of the Website Services.

- To comply with any applicable law, regulation, legal process, or governmental request.

- For any other purpose disclosed to you in connection with our Website Services from time to time. If we intend to process your Personal Information for a purpose other than that set out above, we will provide you with information prior to such processing. It is also in our legitimate business interests to process your Personal Information to protect our rights or property, or the security or integrity of our Website Services. Third-Party Content. The Website Services may offer access to third-party services. These services may collect and use your information. This Privacy Policy does not extend to third-party apps or add-ons (which may also collect your information) even if packaged by CRS LLP or offered through the Website Services.

2. Platform

We collect Personal Information including payment details, as set out above, in order to provide access to the Platform under the contract between CRS LLP and you. We are also required to keep these payment details to comply with our own legal obligations. We also collect and process usage data when you use our Platform (e.g., IP address, session duration, activities undertaken on the Platform, and other use data) ("Usage Data") in order to provide, maintain, and improve our Platform. In addition, we collect and process data about our Platform, features, or users in order to improve the Platform ("Analytics Data"). Analytics Data may include information about the devices operating the Platform (e.g., browser type/version, OS type/version, device type/version), or such other similar information about user configuration or operation of service features or functionality. Version: September 5, 2024 4 Whilst both Usage Data and Analytics Data may not contain information that we can use to identify you in the "real world" (such as a name or address), we collect this data and store it against a uniquely assigned ID. In certain circumstances CRS LLP may process your personal data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Information and be given information on criteria and procedures applied. You may request an explanation about automated decision-making carried out. You may also request that a natural person review related decisions where such a decision is exclusively based on such processing. We may use algorithms to perform certain data analysis to, for example, monitor the transactions for fraudulent activity as well as to review the general performance of our clients. If such analysis raises concerns about fraudulent activity, we may take steps to close the client account and liaise with regulators as necessary. How we use Platform data: Usage Data. CRS LLP uses Usage Data to: ● Positively identify and determine eligibility of customers opening accounts ● Evaluate whether currency trading is suitable for each customer ● Complete bank deposits and withdrawals ● Effect, administer or execute transactions requested or authorized by the customer ● Maintain or service the customer's account with CRS LLP ● To enter into a contract with you or to perform a contract already in place between us. Analytics Data. CRS LLP uses Analytics Data to better understand how our

Platform is being used, make improvements, and develop new features, products and services. We may use this data to:

- Better understand how our users configure and use our Platform
- Determine which configurations or practices optimize performance (e.g., best practices)
- Perform data analyses and audits
- Identify, understand and anticipate performance issues and the environmental factors that affect them
- Other such business purposes relating to the operation, improvement, or development of our Platform.

The use of Analytics Data, for the purposes described above, is carried out pursuant to our legitimate business interests to develop, expand and improve our Platform offering. We balance our legitimate business interests with your privacy rights and take steps in how we process and use Usage Data and Analytics Data to protect each of them. Personal Information collected online may be combined with other information customers provide to CRS LLP Version: September 5, 2024 5 in hard copies or through the CRS LLP help desk.

D. Disclosure of Customer Personal Information CRS LLP may disclose Personal Information of current and former customers to affiliated and non-affiliated third-party entities in connection with our business, including, without limitation:

- any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries;
- CRS LLP's service providers that perform services on CRS LLP's behalf under written agreements which restrict use of Personal Information to the limited purposes for which it is provided to them and to refrain from further use or disclosure except as permitted by law. This may include companies who perform background checks or identity verification, tax declarations storage and verification, payment service providers, infrastructure, data analysis, business intelligence, customer relationship platform providers, marketing support services providers, consumer research service providers, cloud service providers, and IT service providers;

- credit reference and information agencies;
- CRS LLP strategic partners to permit them to assess your interest in Website Services, including foreign exchange payments and international money transfers;
- CRS LLP affiliates, who are permitted to disclose and use the information only to the extent that CRS LLP may disclose and use the information under this Privacy Policy;
- CRS LLP's attorneys, accountants and auditors;
- persons holding a legal or beneficial interest relating to the customer's account;
- persons acting in a fiduciary, representative, or attorney capacity in relation to an account;
- to protect against actual or potential fraud, unauthorized transactions, claims or other liability;
- government, regulatory or law enforcement agencies to the extent permitted or required by law, or to comply with applicable legal requirements
- to monitor our services, whether provided by ourselves or a third party;
- to comply with civil, criminal or regulatory investigations, or judicial process, summons or warrant by appropriate federal, state, or local authorities; or

● as required in the event of a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of CRS LLP's business, assets or stock (including in connection with any bankruptcy or similar proceedings). The client confidentiality obligations set out in our Privacy Policy do not and will not apply to, and in respect of, any confidential information required to be disclosed (by us or you) pursuant to any applicable law, or the lawful request of any court of competent jurisdiction, government agency, or regulatory body, provided in each case we(or you) notify and consult with you (or us) in advance and as to the timing and content of such disclosure, except where applicable law prohibits us (or you) from doing so. Except as stated in this Privacy Policy, CRS LLP will not share Personal Information about any current or former customer with any non-affiliated third party without the customer's prior written consent.

E. How we secure your Personal Information

All information you provide to us is stored on our secure servers. CRS LLP has implemented procedures to safeguard customer Personal Information. CRS LLP limits access to Personal Information only to those CRS LLP employees who need to know that information in order to provide our products or services to our customers. CRS LLP maintains physical, electronic and procedural safeguards to protect Personal Information. CRS LLP protects customer account information by keeping it on the secure portion of its website, using firewalls and other security technology to protect its network and systems from external attacks, and by requiring customers to enter a unique user ID and password to access the CRS LLP systems. CRS LLP conducts periodic internal audits of its business practices and procedures, examining its confidentiality standards and information access, in order to best protect our customers' Personal Information.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website Services and Platform, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Website Services and Platform; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

F. For how long we retain your Personal Information We retain Personal Information (a) in relation to the Platform, for as long as you have an account with us in order to meet our contractual obligations to you and for five years after the end thereof to identify any issues and resolve any legal proceedings, (b) in relation to Website Services, for 12 months unless such data is likely to relate to a contract you may enter into in the future, and subject to any access requests you may make, and (c) in relation to any data provided with consent for research purposes, until such time when the data are no longer needed for the purpose for which they were originally collected.

We may also retain aggregate information beyond this time for research purposes and to develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

G. Customer Recourse

Any concerns a customer may have regarding CRS LLP's Privacy Policy or specific complaints about how customer Personal Information has been collected, used or disclosed should be sent in writing to CRS LLP's Privacy Officer. CRS LLP will thoroughly investigate the complaint and will take whatever actions that are warranted and notify the customer once such investigation and actions have been completed.

H. Cookies Cookies are small text files placed in visitors' computer browsers to store their preferences. The Website Services, our Platform, and our third-party partners, collect and store information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

CRS LLP collects information about your device and uses tracking mechanisms such as cookies to:

- facilitate customer use of our website and mobile applications,
- enable customization of our online services and website features,
- avoid customer re-entry of data,
- store customer preferences for certain kinds of information,
- enhance security measures, and
- gather data about usage of our website and mobile applications for research and promotions.

CRS LLP uses cookies from third-party service providers to facilitate website tracking and security measures and may share the information collected with third parties acting as our service providers, who are required to maintain the confidentiality of the information.

We use these cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate business interests (where we have determined that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use.

We use the following types of cookies:

- Essential cookies. These are cookies that are required for the operation of our Website Services and/or our Platform and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our Website Services and/or our Platform.
- Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our Website Services and/or our Platform when they are using it. They help us improve the way our Website Services and/or our Platform works, for example, by ensuring that users find what they are looking for easily.
- Behavioral cookies. These are used to recognize you when you return to our Website Services and/or our Platform. They enable us, subject to your choices and preferences, to

personalize our content, greet you by name and remember your preferences (for example, your choice of language or region).

- **Marketing cookies.** These enable you to experience more relevant online content and see ads which are aligned with your interests, as indicated by your activity on our site.

Customers can configure their browser preferences not to accept these cookies, except for essential cookies. Declining to accept optional cookies, however, may result in reduced functionality. Some third-party vendors that provide ads on CRS LLP web pages may use cookies to collect details on customer website visits and other data (not including names, addresses, email addresses, or telephone numbers) in order to provide ads about goods and services of particular interest to individual customers. For more information on this practice or to opt out of non-essential cookies, customers can visit the Network Advertising Initiative site. Opt-outs are also available for Google Analytics.

- **Links to non-CRS LLP websites**

The CRS LLP website may provide links to third-party websites for customers' convenience and information. If customers decide to access those links, they will leave the CRS LLP website. CRS LLP does not control those Version: September 5, 2024 8 third-party sites or their privacy practices, which may differ from CRS LLP's. CRS LLP does not endorse or make any representations about third-party websites. Any Personal Information customers choose to give to unrelated third parties is not covered by CRS LLP's Privacy Policy. Customers should review the privacy policy of any third-party website before submitting Personal Information. Some third-party companies may choose to share their Personal Information with CRS LLP. That sharing is governed by the disclosing company's privacy policy.

J. Notification of Policy and Policy Changes

CRS LLP provides an initial notice of its Privacy Policy to customers at the time it establishes a customer relationship, and at least annually thereafter, and the Privacy Policy is dated and posted on its website. Updates will be posted on the CRS LLP website, so our customers will always know what information we collect, how we use it, and what choices they have.

K. Plaid

CRS LLP uses Plaid Inc. ("Plaid") to gather customer data from financial institutions. By using our service, you grant Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy.

L. Data transfer to other countries

The Personal Information transferred within or outside CRS LLP as set out in sections B, C and D, is in some cases also processed in other countries. We only transfer your information abroad to countries which are considered to provide an adequate level of data protection, or in the absence of legislation that guarantees adequate protection, based on appropriate safeguards

(e.g., standard contractual clauses adopted by the European Commission to the extent recognized by the competent Data Protection Authority or another statutory exemption) provided by local applicable law.

M. Your Data Subject Rights

You may exercise certain data subject rights available to you under applicable data protection laws. Where such rights apply, we will comply with requests to exercise these rights in accordance with applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate business interests or to comply with a legal obligation. If these rights apply to you, they may permit you to:

- receive information about the processing of Personal Information concerning you. You are also entitled to access (and/or receive a copy of) your Personal Information.
- request the rectification or erasure of your Personal Information held by us.
- object to the further processing of your Personal Information, including the right to opt out of marketing.
- request that your Personal Information be moved to a third party. Depending on the nature of your request, such as erasure, we may not be able to provide you with access to some or all of the Website Services and/or Platform, since we process your information in order to provide you with such access.

Your right to withdraw consent:

Where the processing of your Personal Information by us is based on consent, you have the right to withdraw that consent at any time by contacting us as per section M below.

How to exercise your rights

You can also exercise the rights listed above at any time by contacting us at privacy@capitalriseresolutions.com.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority (in your habitual residence, your place of work, or where the alleged infringement took place).

If you are a California resident, you may have certain rights in addition to those mentioned in Section M. Per California Consumer Privacy Act ("CCPA") and other applicable local privacy legislation:

- We may be obliged to provide you with the categories of personal information we have collected or disclosed about you and the categories of sources of such information; the business or commercial purpose for "collecting," "selling," or "sharing" your personal information, the categories of third parties to whom we disclose or "sell," or with whom we "share," Personal Information and the categories of Personal Information we "sell". In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights.

● The CCPA defines a "sale" as the disclosure of Personal Data for monetary or other valuable consideration. CRS LLP does not sell and has not, within at least the last 12 months, sold Personal Data, including Sensitive Personal Data that is subject to the CCPA's sale limitation. We also do not sell Personal Data for cross-context behavioral advertising within the scope of CCPA. To learn more about your right to opt out of such "sales," please submit a request to privacy@capitalriseresolutions.com.

● You may limit the use or disclosure of your "sensitive personal information" (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for purposes of which you cannot opt out under the CCPA.

N. Contact Us:

We will never ask you for security information such as passwords over the phone (calls or text) or by email. If you receive a call or email which you are not sure has come from CRS LLP, please contact us at privacy@capitalriseresolutions.com.

We value our customers' opinions. If you have any comments or questions about our Privacy Policy, please contact us at privacy@capitalriseresolutions.com