

Last Updated: MAY 2025

This privacy policy (the “**Policy**”) explains how the BABA group (collectively “**BABA**”, “**we**” or “**us**” and each member of the BABA group for whose services you registered, the “**BABA Entity**”) collects, uses and discloses personal information through its websites, mobile applications, and other online products and services that link to this Policy, including any of the products and services detailed in the following paragraph (collectively, the “**Services**”) or when you otherwise interact with us.

1. GENERAL INFORMATION

The collection and use of personal information constitute an integral part of the Company’s daily business activity, whereby the Company intends to provide the best services and products to its clients, including potential ones.

The present Privacy Policy (“Policy”) is an integral part of the public documents’ set, which is aimed to establish and regulate the approach of the Entity in relation to the application of aggregated client’s personal information while providing services to them. The Policy is revised periodically to ensure that all newly appeared legislative changes, technological solutions, changes related to business practice are comprehensively incorporated in a proper way and maintain the most up-to-date character.

Since the Policy has been adopted as a part of Company’s set of documents, the acceptance of this Policy is indispensable for the provision of the Company’s services. If the potential or actual client refuses to give a consent to the terms of present Policy, it shall immediately lead to the cease of all services and termination of other contractual arrangements between Client and the Company.

This Policy applies a range of privacy-related terms, among others the listed definitions are:

- Consent shall mean intentional, unambiguous and freely given permission of the client to process the data relating to him or her;
- Encryption shall mean the method whereby the data (irrespective of its form and format) is converted to an encoded version which can be subsequently decoded by the persons having an access and decryption key;
- Processing shall mean an action or a set of actions, performed on personal data or personal information whether or not by automated means;
- Third party shall mean any legal or natural person, public authority, body or agency which are authorized to request an access to or process personal data under the authority of the Company or in cases prescribed by law;
- Personal Data or Personal Information shall mean any information related to an identified or identifiable client of the Company;

- Secure Sockets Layer (“SSL”) shall mean a cryptographically secured protocol, used for the secured connection and transmission of data;
- PCI Data Security Standard (“PCI”) shall mean a self-regulatory system that provides an enforceable security standard for payment card data which also covers a compulsory application of the security assessments and violations’ detection.

2. PERSONAL INFORMATION: TYPES AND METHODS OF COLLECTION

The personal information of the client is collected in two possible ways, namely manual and via the automated means. The data, collected manually, means that the client takes all reasonable steps in the provision of the particular information or a document.

The Policy sets the following types of the personal data to be acquired from a client prior to and in the course of business relations between client and the Entity:

- Full name as provided in passport or other ID, date of birth and residence address;
- Contact details such as emailing address, telephone number, fax of any other;
- Information regarding the client’s income, including source of funds, financial assets and liabilities, bank account information;
- Trading performance, knowledge and experience;
- Identity verification documents such as Passport, ID Card or Driving License;
- Residence verification documents such as utility bill, residence certificate or other; and
- Preferences on which of the Company’s services and products the client is interested in.

The Policy sets the following information that is acquired via the automated means:

- IP-address;
- Network system;
- Type of operational system; and
- Types and settings of browser;

By the general rule, the information, collected via automated means, should not be considered as able to identify client neither directly or indirectly. The list of information, requested from the client, should not be considered as exhaustive. The Company preserves the right to request additional data especially in those cases, when it is necessary to ensure the compliance with the regulations of existing legislation.

3. COOKIES

Cookies are the small files stored on a computer or other device and used by the web server for the keeping track of the end user’s browser activities, including delivering of individually tailored requests into a session. This

means that cookies are used for the assessment of advertisements and promotions as well as evaluate clients' interests in services and products, provided by the Company.

The cookies foresee the possibility of choice whether to accept all, restrict to limited range or withdraw from them. However, the client should note that partial or full restriction of cookies would lead to impossibility to access or use certain parts of the Company's website or its features.

4. TYPES OF DATA ACQUIRED FROM USERS' DEVICES

Web Bugs (or web beacon, pixel tag, clear GIF) which constitute a little graphic image that is usually delivered via web-browser or an email and used for the tracking of emails' delivery, web-page viewing and other statistical information.

Device information which is obtained at the moment of client's access to the website. The recognition of client's device is important for the delivering of the most appropriate version of the website.

Log information which is necessary for the tracking of website user's activity and ensure the diminishing any potential inconsistencies.

Location information, through the identification of the IP address in order to be able to localize the content for a particular country that the client sees on the Entity's website.

5. BASIS AND PURPOSES OF PERSONAL DATA PROCESSING

Statutory compliance. In order to be able to provide the its services, the Company is subject to the compliance with a range of legislative provisions, in particular, establishing the regulation on the prevention of the money laundering and terrorism financing, financial services' provision, taxation, corporate and other branches of law etc.

Performance of contractual obligations for the provision of services. The Company processes personal data to accomplish on-boarding, Know Your Customer and Customer Due Diligence procedures and provide its services and products

Formation of a profile and assessment of the appropriateness. The Company needs to process the personal information about the client at the moment of account opening for him or her. Subsequently and on a periodical basis, the company has to perform an assessment on the provision of only appropriate services to the clients.

Marketing Purposes. The personal data, processed by the Company, may be useful in view of sending marketing communications to the client in order to ensure that the latter is informed about latest news, changes, improves related to the services of the entity. The client preserves the right to withdraw from marketing communications, however this does not cover cases when Company intends to deliver information of legal nature.

Improvements into Company's services and products, including client services. The company may use information acquired from the client by his activity and use of services in order to monitor the quality of the latter as well as introduce changes and improvements when necessary.

Development and marketing of newly introduced services and products. The information, stated in the preceding paragraph may also be applied for the creation and promotion of new services.

Legitimate concerns. The Company has to protect and ensure efficiency of its legitimate interests related to various aspects. The latter may cover the use of personal information. The example of personal information' involvement includes such examples as exercise of internal business management, risk management, records keeping, adoption of security measures, operation of internal Company's IT system, marketing purposes, communication with clients, in particular, on legal matters. At the same time, the Company undertakes an obligation that the use of personal information for own legitimate interests would not violate security of the mentioned data in any possible way.

6. STORING OF PERSONAL DATA AND RETENTION PERIOD

The Entity undertakes all reasonable efforts in ensuring comprehensive security of personal data against external vulnerabilities. Security Sockets Layer encryption technology is used to introduce the enhanced protection of the information.

Application of the PCI Scanning measures as well as Transport Layer encryption and AES algorithm in Application layer with a key length 256 bit are intended to diminish risks associated with external overriding threats in relation to data, stored on credit cards.

Complex authentication systems and access control mechanisms are applied for the avoidance of unauthorized access to systems and data, which are kept on different internal systems as well as in secured servers.

In cases, when business relationship is terminated, the Company may have some obligations to retain the personal information for a certain period of time. Such retention can be prescribed by law and incur data storing in different amount and for different time period.

7. DISCLOSURE AND SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

The Entity shall not disclose clients' personal data to any third party. The following cases shall exclude the Entity from any liability for disclosure and sharing of personal information to third parties:

- In accordance with applicable laws, regulations, prescriptions or other instruments of binding nature, the Company may disclose the personal information to the required extent on its own or by legitimate request of state authorities, law enforcement bodies, judicial orders, regulatory authorities; or

- The disclosure to third parties, which perform the execution of certain functions of the Company, act under the authorization of the Company, comply with Company's compliance procedures and maintain the efficient level of personal information's security.

8. CHANGES IN THIS POLICY

This Policy is subject to a timely revising to take into account new laws and technologies, changes to Company's operations and practices as well as to ensure that the Policy corresponds to the changing environment. The clients will be notified about the mentioned revisions through the available communication means.