

## PRIVACY POLICY

### 1. Definitions

<b>Client</b>	Individual/natural person, legal person or a person without legal entity that has signed with RallyTrade an Agreement for Provision of Brokerage Services;
<b>Client Agreement</b>	Agreement for Provision of Brokerage Services that was concluded with a Client;
<b>Durable Medium</b>	Any medium which enables the User to store information in a way accessible for future reference for a period of time adequate to the purposes of the information;
<b>RallyTrade</b>	FRNG LTD, company registered in Nigeria;
<b>RallyTrade Office</b>	The registered office of FRNG LTD;
<b>RallyTrade Website (Website)</b>	The RallyTrade website;
<b>Login</b>	Unique ID code assigned to a certain User in order to access certain Account or Section of the Website, and performing instructions;
<b>Password</b>	Unique confidential password of a User that is necessary for access certain Account or Section of the Website, and performing instructions;
<b>Privacy Policy</b>	The herein document containing the privacy policy for using the RallyTrade Website;
<b>T&amp;C</b>	Terms and conditions for providing brokerage services by RallyTrade., which represents an annex and an integral part of the Client Agreement for providing Brokerage Services, which can be found on RallyTrade Website;
<b>User</b>	A person that accesses and uses the RallyTrade Website;

### 2. General provisions

- 2.1. RallyTrade would like to inform you that the security of your personal data and as well your intimacy on the Internet is very important aspect of the relationship with our customers.

- 2.2. Consequently, RallyTrade adopts powerful measures and clear written policies for ensuring the privacy, confidentiality and security of the personal confidential data, information and actions of our Clients and Users of the Internet Page.
- 2.3. During the activity that RallyTrade is performing, and as well during the provision of services, RallyTrade stores and processes personal data of Clients and Users.
- 2.4. By the means of the herein Privacy Policy we would like to inform you about how exactly RallyTrade handles your personal information, and what are your rights and obligations in respect to such process.

### **3. What data do we collect?**

- 3.1. When you subscribe with RallyTrade in order to open a Demo account, Real Account or other accounts, in order to be able to provide you with the services and products that you require, RallyTrade collects and processes the data from the list below:
  - a. Personal identification data – such a name, surname, age, nationality, address, marital status, personal identification number, other information contained on the ID document, etc;
  - b. Contact data – such as email address, phone number, fax number, correspondence address, etc;
  - c. Banking information – such as your bank account number, credit card number, etc;
  - d. Financial information – such as income, source of wealth;
  - e. Other information such as employment status, education, investment knowledge and experience, purpose of transactions, frequency and value of expected activity, political exposure, beneficial owner and other information that is required by the law;
  - f. Other information regarding IPs, cookies, internet traffic or navigation, etc.

### **4. Security and confidentiality**

- 4.1. Please be informed that all your confidential data and personal information is kept strictly confidential.
- 4.2. RallyTrade has adopted appropriate policies and procedures in order to ensure full security and non-disclosure of your personal and confidential data, and prevent access of non-authorized persons to it.
- 4.3. To prevent unauthorized access into our system RallyTrade has implemented a series of physical and electronic security measures in order to stop unauthorized access to our internal systems.

## **5. What is the purpose of and how do we use the data that we collected?**

- 5.1. Such data is collected strictly for the purpose of providing the services, and it will be used solely in accordance the terms and conditions of this notice.
- 5.2. Please be informed that usually the information from the list above is required by the law, and is necessary in order to create an investor profile of a Client, to evaluate and assess the risk tolerance and the appropriateness of such Financial Instruments for the Client, and in order to provide the Clients with appropriate warnings regarding the compatibility of such services with their profiles.
- 5.3. Also, with the express consent of the User, this information is being used by RallyTrade in order to:
  - a. improve the quality of the offer, products and services provided;
  - b. improve the content of the website;
  - c. notify the users about any changes in the offer, products, services or regulations that govern RallyTrade's activity;
  - d. inform clients by sending newsletters or any other information regarding new products, services, opportunities, special offers or promotional materials that might be of interest for the User.
- 5.4. It is possible that from time to time RallyTrade will contact the Users who provide their consent, by email, phone, fax, mail, etc.
- 5.5. The User has the right and may at any time revoke the consent mentioned above, and RallyTrade will immediately cease to contact the client for any purpose,

except for the purpose of fulfilling its legal obligations according to any Agreement signed with the Client, and to any legal obligation what so ever.

## **6. Disclosure of personal data**

6.1. RallyTrade will keep and ensure full confidentiality of your personal data and not disclose it to any third party.

6.2. RallyTrade may disclose your personal data in the following situations:

- a. Upon your express consent (which can be revoked in any moment);
- b. When such disclosure is legally required by an official institution that has the legal right to ask RallyTrade to disclose such information disregarding the Professional Secrecy;
- c. When a Client signs the Client Agreement for Provision of Brokerage Services, solely for the purpose of executing that Agreement;

6.3. By signing the Client Agreement mentioned in point c, the Client confirms that RallyTrade can rely on the personal data that the he/she provided, and can store and process the personal data for the purpose of executing the mentioned Agreement, including (but not limited to) maintaining the relation with the Client, maintaining the Trading Accounts for the Client, collecting the debts, examining the process of Client applications, assessing the risk, ensuring regulatory compliance, development and analysis of products and services, etc.

6.4. By signing the Client Agreement mentioned in point c from above, the Client understands that, in order to provide financial services, RallyTrade might need to transfer Clients' personal data, information regarding the activity on the account, copies of the documents provided by the Client or any of the information that client Provided, to third parties with which RallyTrade needs to have a relation for the purpose of executing the Client Agreement or the agreement closed with these entities. Such third parties can be banks, auditors, other investment firms, any other service providers such as IT companies, marketing agencies, introducers, advisors, accountants, couriers, any company that is controlled by RallyTrade, or belongs to the same group as RallyTrade, or is in close relation to RallyTrade. The Client authorizes RallyTrade to transfer the data and/or documents mentioned above to the third entities mentioned above, in the conditions mentioned above, for the purpose of executing the agreements mentioned above.

## 7. Cookies

- 7.1. RallyTrade uses cookies in order to collect the data.
- 7.2. A cookie is a small text file which asks permission to be stored on your computer's hard drive, having the purpose of maintaining record of your visits on the website. Once you agree, program that analyzes your traffic and store certain data.
- 7.3. The cookies allow you to improve your comfort in using the website, by allowing you to store your passwords and preferences for using the website, remember your options and offer you a customized treatment as an individual user.
- 7.4. The cookies also allow us to improve our website by offering us the possibility of measuring the activity from the Website, the effectiveness of each page, the navigation patterns, observing which areas are of most interest for Users and improve our website and conditions that we offer to the Users. This process helps to optimize the structure so that your experience will be as smooth as possible.
- 7.5. We do not use cookies to retrieve information that was not originally sent in a cookie.
- 7.6. We do not use information transferred through cookies for any promotional or marketing purposes directly without your consent.
- 7.7. Note that you can at any time to refuse to accept or delete cookies. Most web browsers automatically accept cookies, but these settings can generally be modified if so desired.
- 7.8. Please note that refusal of cookies may result in decreased quality website and thus of your navigation experience.

## 8. Links to other sites

- 8.1. The RallyTrade Website may contain links to other websites. If you access such links, once you choose to leave our site following the redirection of those links you should take into account that any influence or responsibility of RallyTrade is no longer applicable. RallyTrade cannot be responsible for the security of data for other sites. The User should always be careful with the security options and carefully read the privacy policy of every visited website.

## 9. Changes and updates in personal information

- 9.1. You can always modify the personal information that you have provided to RallyTrade by sending an email to [support@rally.trade](mailto:support@rally.trade). In case you are a Client, you can change such data according to the rules for modification of personal data stipulated in T&C.
- 9.2. In case that the User is a Client who concluded an Agreement for Provision of Brokerage Services, the Client understands that it is his responsibility and obligation to notify RallyTrade regarding any modification of any of the data provided.
- 9.3. In case that the client fails to fulfill such obligation, the Client is warned that providing the services in the conditions of incorrect data provided by the Client may result in incorrect informing of the Clients prejudices or beaches of confidentiality clauses for which RallyTrade cannot be responsible.
- 9.4. The Client understands that he is solely responsible for and RallyTrade shall not be liable for any legal situation, prejudice or loss that might occur due to failure of the Client to fulfill the above mentioned obligations.

## 10. Changes in the Privacy Policy

- 10.1. RallyTrade may modify the herein Privacy Policy at any time and without prior notice. The User should review the most current version the Privacy Policy by visiting the RallyTrade Website and clicking on the Privacy Policy hyperlink located at the bottom of the page. The Users' use of RallyTrade Website is governed by the version of the Privacy Policy which is in force on the date at which the Website is accessed by the User.

## 11. Revocation of consent

- 11.1. If you have previously enabled RallyTrade to use your personal data for marketing purposes, you may change your mind at any time by notifying RallyTrade in writing at the following email address: [marketing@rally.trade](mailto:marketing@rally.trade).

## 12. Details about the Company

- 12.1. FRNG ("RallyTrade") is registered with the National Trade Register number RC 1288748.

12.2. For any additional information about RallyTrade, please visit the Website [www.rally.trade](http://www.rally.trade).

12.3. Any questions about the Privacy Policy in connection with the Website should be directed to: [support@rally.trade](mailto:support@rally.trade).