



## Privacy Policy

This Privacy Policy governs personal data processing of our Clients and Website visitors of Digital Markets LLC incorporated in St. Vincent and the Grenadines with company number 135 LLC 2019 and whose registered office address is at First St. Vincent Bank Ltd Building, James Street, Kingstown, St. Vincent and the Grenadines.

Digital Markets LLC (hereinafter, "**MyBro**", "**we**", "**us**" or "**our**") are committed to protecting and respecting your privacy.

Please find below some basic definitions which may help you to understand this Privacy Policy:

### Definitions

**Personal Information (personal data):** means any information which identifies you personally or which may help us to identify you (e.g. *your name, address, e-mail address, trades etc.*).

**Data subject:** means an identified or identifiable person (our Client).

**Personal data processing:** any operation or set of operations performed on personal data, including collection, storage, use, disclosure erasure.

### **Gathering and Use of Personal Information**

We may collect your Personal Information if you use MyBro and open a Profile to use the Platform or perform any Transactions on the Platform. This is defined as collection for the purpose of provision of service(s) to you in accordance with our Terms of Use. Please note that if you refuse to share your Personal Information for this purpose we will not be able to provide our services to you.

The types of Personal Information which we collect may include:

- your name;
- your photographic identification;
- details from your identity documents (such as driver license, passport), number of the document, date of issue and expiration, photographic identification, address etc.;
- your address;
- your phone number;
- your e-mail address;
- your IP address, Browser and Operating System information, geolocation details;
- your banking details including account numbers and payment card data;
- your date of birth;
- your employment details;



- your trades;
- information on sources of your funds;
- video footage identifying you.

We will process your Personal Information only for the purpose(s) of providing to you the service(s) that you ask us to provide you, to satisfy the legal obligations stemming from regulatory obligations that arise from providing you the service(s) and our legitimate interest.

Based on our legal obligations and legitimate interest we may request other documents for your identity verification and the sources of your funds confirmation for the purposes of money laundering and fraud prevention. To know more about it please see our AML/KYC Policy and Anti-Fraud policies.

We may use your Personal Information for the following purposes:

- to allow you to open and operate a Profile on the Trading Platform;
- to enable you to complete Transactions on the Trading Platform;
- if you contact us, to reply to your queries;
- to contact you via email or call back option;
- to ensure security of your Profile;
- to analyse use of our Website;
- as required for regulatory purposes such as tax, prevention of money laundering, prevention of fraud, adherence to MyBro statistical reporting obligations etc.;
- to provide you with information about products and promotions that may be of interest to you, from ourselves and third parties, although only if you have specifically agreed to receive such information;
- for market research e.g. surveying our Clients' needs and opinions on issues, such as our performance etc. Unless consented, your data for this purpose would be anonymised.

### **Children's personal data**

Please note that our services are exclusively offered to individuals at least 18 years old. We do not process any Personal Information of children under this age.

### **IP Addresses**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our clients' browsing actions and patterns and will not be used to identify any individual unless that same individual.

### **Cookies**



We use a browser feature known as a "cookie", which assigns a unique identification to your computer. Cookies are typically stored on your computer's hard drive. For more information please refer to our Cookie Policy. Information collected from cookies is used by us to evaluate the effectiveness of our Sites, analyse trends, and administer the Platform. The information collected from cookies allows us to determine such things as which parts of our Sites are most visited and difficulties our visitors may experience in accessing our Sites. With this knowledge, we can improve the quality of your experience on the Platform by recognising and delivering more of the most desired features and information, as well as by resolving access difficulties. We also use cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help us confirm your receipt of, and response to, our emails and to provide you with a more personalised experience when using our Sites.

We use third party service provider(s), to assist us in better understanding the use of our Sites. Our service provider(s) will place cookies on the hard drive of your computer and will receive information that we select that will educate us on such things as how visitors navigate around our Sites, what products are browsed, and general Transaction information. Our service provider(s) analyses this information and provides us with aggregate reports. The information and analysis provided by our service provider(s) will be used to assist us in better understanding our visitors' interests in our Sites and how to better serve those interests. The information collected by our service provider(s) may be linked to and combined with information that we collect about you while you are using the Trading Platform. Our service provider(s) is/are contractually restricted from using information they receive from our Sites other than to assist us.

To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You may control the cookies through the browser settings. Find out how to manage cookies on browsers:

[Google Chrome](#)

[Mozilla Firefox](#)

[Microsoft Internet Explorer](#)

[Opera](#)

[Apple Safari](#)

Please note that our KYC Provider may ask you to provide other information and documents containing Personal Information (such as identity documents, confirmation of sources of your funds, etc.) for the purposes of your identity verification, KYC/AML and trading knowledge assessment. To know how your personal data will be processed by the KYC Provider, please refer to their Privacy Policy.

We also receive the following information indirectly from our KYC Provider:



- Your verification status;
- Your Knowledge and experience assessments;
- Processing of your Personal Information.

## **Disclosure of Personal Information**

We use the Personal Information for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law.

We may make available the Personal Information that you provide to us for the limited purpose indicated for and during the provision of the service that you would have requested in particular to:

- our affiliates, agents and representatives;
- payment service providers and financial institutions;
- customer communications platforms;
- our contractors providing software for identity verification purposes;
- our contractors provide us information on sanctions lists from publicly accessible sources.

We may also share Clients' Personal Information with financial institutions, insurance companies or other companies in the case of a merger, divestiture, or other corporate re-organisation and notify you of such sharing of your information to be able to exercise any of your rights where applicable.

We may also share your Personal Information to law enforcement or regulatory agencies, if required by law. In certain cases, we may not be able to inform you of such sharing of data due to legal restrictions.

Any third party which receives or has access to Personal Information shall be required by us to protect such Personal Information and to use it only to carry out the services they are performing for you or for MyBro, unless otherwise required or permitted by law. Such a third party, except for regulatory authorities, would be contractually bound to adhere to the same security and confidentiality policies as MyBro and assume the same responsibilities as MyBro.

The legitimate exercise of any of your rights with MyBro will also be notified to be applied by any such third parties having been given access to your Personal Information.

We will ensure that any such third party is aware of our obligations under this Privacy Policy and we will enter into contracts with such third parties by which they are bound by terms no less protective of any Personal Information disclosed to them than the obligations we undertake to you under this Privacy Policy or which are imposed on us under applicable data protection laws.

## **Your rights**



You have the right to access your Personal Information and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to us at [support@mybro.com](mailto:support@mybro.com) or where possible, you can do these actions in your Profile page yourself.

Upon your written request at [support@mybro.com](mailto:support@mybro.com), we will inform you of the Personal Information relating to you that we hold and the use and general disclosure of your Personal Information. We will also give you a copy of the Personal Information we have retained. There may be a minimal charge for providing you additional copies of your Personal Information to cover administrative costs.

You may also request the erasure of both the Profile and Personal Information by sending an email to us at: [support@mybro.com](mailto:support@mybro.com). MyBro will action your request, unless we have a legal or regulatory obligation or overriding legitimate interest to store your Personal Information (for instance, in cases you have performed transactions).

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Moreover, you have the right to restrict and object to the processing of your personal data in certain circumstances.

To ensure the confidentiality, integrity and availability of your information to yourself, we may request you to confirm your identity by providing identification documentation and/or other methods prior to assisting you in exercising any of your rights.

If you refuse to prove your identity, we may decline to take actions in respect of your data, save restricting processing, until we can ensure that such actions are the true wish of the data subject.

In the carrying out of our services we may use automated processing and profiling to reduce the risks of fraud, money laundering and abuse of our services. Through this automated processing, we carry out an analysis of your identification, transactional and behavioral patterns.

We may not be able to provide you with some or all our services if you do not wish this automated processing to be carried out. If you feel that this processing might be detrimental to you, please contact us on [support@mybro.com](mailto:support@mybro.com), and our compliance officer will review your application.

Please note, if you make a request, we have one month to respond to you.

## **Security**

We have implemented technical and organizational security measures to ensure the confidentiality, integrity and accountability of your Personal Information and to protect your Personal Information from loss, misuse, alteration or destruction. Such measures include:

- the pseudonymisation and TLS 1.2 encryption of personal data;
- 2-factor authentication;
- the access control;



- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

Only authorized personnel of MyBro have access to your Personal Information, and these personnel are required to treat the information as confidential.

Where you have consented to, or we are obliged to pass on Personal Information to third parties to provide you with a requested service or in the carrying out of a regulatory or legal obligation, we will request that the same levels of technical and organizational security measure be applied through contractual arrangements, where possible.

We conduct testing, assessment and evaluation of our technical and organizational measures effectiveness on a regular basis. Technical and organizational security measures in place will, from time to time, be reviewed in line with legal and technical developments.

In the event of a personal data breach or the failure of the measures of protection of such information we will immediately notify you without undue delay.

### **Disposal of Personal Information**

Once we do not have any obligation to provide you with a service you requested, nor an obligation to hold Personal Information for regulatory or legal purpose, we will anonymise or dispose of your Personal Information in line with acceptable industry and security standards so that this cannot be subsequently retrieved and associated with you.

Where we cannot directly remove such records, such as in archived backups, we will retain a log of which Personal Information should be removed if ever the backup data is restored.

### **Marketing**

We will ask you for your consent on registration or post-registration, by providing you the ability to check marketing preferences check boxes located within your Profile page to allow us to contact you or use your Personal Information for marketing purposes. We may also notify our existing Clients on our own products or services similar to those we have already provided based on our legitimate interest.

You have the right to retract the consent for us to process your Personal Information for marketing purposes. You can exercise your right to prevent such processing by unchecking marketing preferences checkboxes on your Profile or by contacting us at any time on [support@mybro.com](mailto:support@mybro.com).

We will store your Personal Information related to your account for the period required under applicable legislation upon account closure.



## Changes

Our Websites policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and absolute discretion of MyBro. If we change this Privacy Policy, we will take steps to notify all clients by a notice on MyBro's Site and will post the amended Privacy Policy on the MyBro's Site.

In case we believe your rights may be affected by any such changes, we will request you to confirm your consideration and acceptance prior to continue our relationship with you.

## **Contact Us**

Please contact us at [support@mybro.com](mailto:support@mybro.com) if you have any comments or questions with respect to this Privacy Policy.