PRIVACY AND CONFIDENTIALITY POLICY
VERSION 1

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PRIVACY & CONFIDENTIALITY POLICY

1. INTRODUCTION

Solara Finance Limited is a Limited Liability Company incorporated under the laws of the Republic of Anguilla, with Registration number A000002475 and Registered Address located at Anguilla, The Valley, AI-2640, No. 9 Cassius Webster Building, Grace Complex, 1330 (hereinafter referred as "the Company").

2. COLLECTION OF NON-PUBLIC CLIENT DATA

During the account opening process for a demo or a trading account, the client is requested to provide the Company with some non-public data. Providing the non-public will enable the Company to evaluate the account opening application pursuant to the applicable laws and regulations governing the provision of the services. The non-public data may be collected (the list is not exhaustive) for the purposes presented under Section 4.

The client's non-public data, are in other words the data provided by the client to the Company which shall not be made available to the public at large, that include but are not limited to the following:

a) Identity Data: Name, surname, address, date and place of birth, gender, country of residence and citizenships, identity documents such as passport, ID, driving license, information which may be publicly available or contained in background check database;

b) Contact Data: Addresses and proof of residency documents, telephone numbers, e-mail addresses;

c) Tax, Financial and Investment Data: FATCA & CRS declarations, information in relation to previous trading experience, source of wealth and source of funds, annual salary and respective pay slips and/or employment contracts, expected trading volumes, types of transactions, tax residence information and numbers, copy of the credit card used to fund the account, all and any other financial information which is required to establish and maintain a client account and/or process client's orders in accordance with the applicable laws;

d) Technical Data: client's internet protocol address, browser information; and

e) Marketing and Communication Data: client's communication preferences and preferences for receiving marketing materials from the Company.

In cases where the client is a legal entity, the Company shall have the right to request all the statutory/incorporation documents and all the relevant documents for all related individuals (directors, shareholders, beneficial owners).

Furthermore, it is to be noted that, periodically and subject to the characteristics of each client, the Company may also require provision of other non-public data to improve the services performed and satisfy the regulatory requirements. The Company collects the non-public data by requesting it directly from the client and/or any other authorized person *(including Company's representatives where applicable)* through application forms or other forms including the maintenance of registers of non-public data provided to the Company during the ongoing performance of its services.

Other than the non-public data collected directly by the client, the Company may also process non-public data regarding clients' transactions with the Company, such as the products traded by the clients including historical data of clients' transactions.

Any non-public data collected by the Company is considered and treated as sensitive data.

3. SAFEGUARDING OF NON-PUBLIC CLIENT DATA

The Company shall not disclose the data of its clients and shall protect the confidentiality of its non-public clients' data. Such non-public data shall be utilised only for the purposes specified and agreed to by the client or as required under any applicable law in the territory of Anguilla. The-public data of the clients are safely stored in the Company's servers that only authorized Company's personnel have access to it through access rights. The Company encrypts all non-public data and information to prevent unauthorized parties from viewing or access such data and information.

4. USE OF NON-PUBLIC CLIENT DATA

The Company collects and process non-public data which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the client. In some cases, the Company may also process the client's non-public data to pursue its legitimate interests or those of third parties, provided that the clients' interests and fundamental rights are not overridden by those of the Company or the third party and that the confidentiality of the client's non-public data is protected.

In view of the above, the Company may use client's non-public data for one or more of the following purposes:

a. to confirm/verify client's identity;
b. to process transactions;
c. to manage the accounts clients hold with the Company;
d. to assess client's appropriateness/suitability to the products and services the Company provides
e. trading account support management;
f. for internal business as well as record keeping purposes;
g. to analyse statistical data to enable the Company
h. to provide the client with better products and/or services;
i. to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation;
j. to defend possible legal claims and/or comply with court orders, judicial processes and or any other requirements of a competent authority.
k. to inform the client of products and/or services that may be of interest to the client;

    l.   to inform the client of amendments of the law affecting the Company's services to the client and products as and when required;

    m.   to keep the client updated on the issues that are relevant to client business relationship with the Company;

    n.   to enhance the security controls of the Company's networks and systems;

The Company also needs to comply with the Anti-Money Laundering regulations, therefore there are documents that must be kept being able for the Company to demonstrate to the authorities that the Company proceeds with appropriate due diligence and in general acts in accordance with the legislation.

If there is no lawful basis, for the disclosure of client's data as indicated above, the client's consent will be required. The client may withdraw such consent at any given time by sending an email to compliance@m4markets.ai unless provided otherwise by the applicable laws and/or regulatory requirements.

It is demonstrated, safeguarded and enshrined that the non-public data is owned at all times by the client.

5. DISCLOSURE OF NON-PUBLIC DATA

The Company may disclose non-public data with business partners and suppliers with whom it may have outsourced certain of the Company's business functions or cooperating with. In order to provide services to the client the Company may be required to disclose client's non-public data to parties located outside of Anguilla i.e. in the European Economic Area or in countries which may not have an equivalent level of data protection laws as in Anguilla. In such situations, the Company will make reasonable efforts to protect the privacy and confidentiality of the client's non-public data, ensuring that all the engaged controllers and third parties processing personal information adhere to a confidentiality clause that is similar to privacy provisions. By submitting client's non-public data, the client agrees to the aforesaid transfer, storage and processing of the client's information.

The Company may also disclose client's non-public data with affiliates or any other company that belongs to the same group of the Company in situations where such information is reasonably necessary for the provision of its products or services to its clients. Henceforth, the Company may disclose some or all client's non-public data with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so. In cases where clients have been introduced by an introducing partner, such introducing partner may have access to client's non-public data. Hence, clients hereby consent to the sharing of information with Company's partners, affiliates, associates and introducing partners as applicable.

All third parties with which the Company shares client's non-public data are required to protect and protect the confidentiality of such client's non-public data in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will refrain from sharing non-public data with third parties that do not meet the necessary standards of safeguarding and privacy required to ensure protection of its clients' confidentiality.

The Company may disclose any non-public client data for one or more of the following purposes:

a. In cases where it is required to disclose such data under mandated Credit Reporting or under any other law or by a court order;

b. In cases where it is requested by the Financial Services Commission of Anguilla and/or any other regulatory authority;

c. In cases where it is requested by fraud prevention agencies, third party authentication service providers, verification/screening service provider's and/or any relevant authorities who investigate or prevent fraud, money laundering and/or other illegal activities;

d. In cases where it is necessary in order for the Company to defend or exercise its legal rights to any court and/or tribunal and/or arbitrator and/or financial ombudsman and/or governmental authority;

e. In cases where it is requested by Company's professional advisors, provided that in each and every case these professional advisors shall be informed about the confidential nature of such non-public client data and commit to the confidentiality obligations as set in this Policy;

f. Technological experts who are appointed by the Company to support the smooth operation of the Company's systems platform providers;

g. Payment service provider's/credit institutions for facilitating the incoming and outgoing payments of the clients;

h. Governmental authorities and regulatory bodies;

i. Data reporting service providers to meet the Company's regulatory obligations;

j. Other companies belonging to the M4Markets Group of companies for business purposes;

k. At client's request;

l. Where the client has been informed about such disclosure and permission has been given in writing by such client;

m. Where the third party in question has been authorised by the client to obtain the data from the financial services provider.

Such disclosure shall occur on a '*need-to know'* basis, unless otherwise instructed by the applicable authority. Provided that such disclosure takes place, the Company shall expressly inform the third party regarding the confidential nature and the need to protect the confidentiality of the client's non-public data. The Company shall arrange that all of its non-public client data controllers and third parties processing personal information shall abide by a confidentiality clause similar in nature to privacy provisions.

6. RIGHTS OF CLIENTS

Every client shall have the right to review the client's data and to correct or amend any inaccurate or deficient data, if found incorrect.

a. The right to review ensures that every client has the right to access and review the non-public data shared to the Company. In particular, the Company is obliged to provide the client with a copy of the specific non-public data it possesses for that client upon client's request; and

b. The right to amend or correct ensures that every client has the right to request amendments or corrections to any non-public data held by the Company that is found to be inaccurate or incomplete. This allows the client to ensure that the provided non-public data is up to date and accurate.

7. COOKIES

The Company uses cookies to gather information about client's access to the Company's website http://m4markets.ai/ and other services the Company provides to the client.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated companies. It is noted that the information collected by such companies is not personally identifiable. To administer and improve the services offered by the Company's website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Most internet browsers are set up to accept cookies. If the client does not wish to receive cookies, he/she may be able to change the settings of the browser to refuse cookies or have the choice whether to accept a cookie or not. However, it is strongly recommended that the client allows cookies on the Company's website to ensure he/she has the best possible experience. Turning off cookies may result in reduced performance of the website and trading platform and may also impair the quality of the services that the Company provides in relation to the client's trading account.

8. SECURITY BREACHES

The Company should report to the appropriate competent authority and to the affected client(s) within 24 hours from the time the Company becomes aware of any such security breaches resulting from the unauthorised disclosure of non-public client data.

9. DATA RETENTION

The Company will keep records containing the non-public data for a period of not less than seven years from the date of the last transaction between the client and the Company.

10. AMENDMENTS TO POLICY

The Company reserves the right to make changes to this Privacy & Confidentiality Policy from time to time for any reason and the client will be notified of such changes by posting an updated version of this Privacy & Confidentiality Policy on the website. The client is responsible for regularly reviewing this Privacy & Confidentiality Policy and the use of this website after any such changes are published, shall constitute an agreement to such changes.

11. LEGAL DISCLAIMER

The Company will not be liable for misuse or loss of personal information/data resulting from cookies on the Company's site(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of client's personal information/ non- public data due to misuse or misplacement of any passwords, negligent or malicious.

12. COMMUNICATION WITH THE COMPANY

Further information on the Company's Privacy & Confidentiality Policy is available upon request. The Company's contact details are:

Email: compliance@m4markets.ai

Address: Anguilla, The Valley, AI-2640, No. 9 Cassius Webster Building, Grace Complex, 1330