

# Privacy Policy

## 1. Introduction

The Future Finance Services LTD (hereinafter referred to as „**Future Finance**“, „**Company**“, „**we**“, „**us**“, „**our**“, as appropriate) endeavours to maintain the highest standards of confidentiality and to respect the privacy of our clients and associated persons and other individuals whose personal information we collect and process. Our commitment to privacy includes being transparent about the nature and extent of that processing and the rights that may be available to you with respect thereto.

This Privacy and Cookies Policy (hereinafter referred to as „**Policy**“) describes how we handle, use, disclose and protect personal data we collect about i) individuals who apply for or receive our products and services, ii) former clients who have terminated their contractual relationship with the Company and iii) visitors of our website. This Policy covers the website [www.leadero.global](http://www.leadero.global), and all its related sub-domains (hereinafter referred to as „**Website**“) and mobile applications that are registered and operated by us.

To protect your privacy, we follow different principles in accordance with worldwide practices for client privacy and data protection. We are the data controller for purposes of the data protection legislation.

We encourage you to read the Policy carefully as it forms part of our terms and conditions, agreement with you and/or terms of use, as the case may be. If you accept or agree to this Policy on behalf of a company or other legal entity, you represent and warrant that you have the authority to bind that company or other legal entity to the Policy and, in such event, “you” and “your” will refer and apply to that company or other legal entity.

If you do not wish for your personal data to be used in the ways described within this Policy then you should not access or use the Website or use the services, functions, or features offered by us.

All capitalized terms used but not defined herein shall have the respective meanings prescribed to them in the Terms and Conditions.

## 2. Collection of Personal Data

For the purpose of this Policy, references to „**Personal Data**“ shall mean any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, for example your name, email address, username, contact details or any unique identifier such as an IP address, device ID or other online identifiers.

We collect Personal Data about you when you access our Website and Trading Platform, create an account, contact us and use our services. Personal Data is sometimes collected directly, such as when you create an account or use our services and sometimes indirectly, such as when you browse our website (please refer to Cookies below). We may receive information about you from other sources, including third parties that help us update, expand, and analyse our records; prevent or detect fraud; process payments; or analyse your use of our services. We also lawfully collect and process personal data from publicly available sources (including, inter alia, the press, social media and the internet). Our services may also

include integrated content or links to content provided by third parties (such as live chat, social media content, plug-ins and applications).

It depends on the particular activities you carry out through our Website and Trading Platform, which Personal Data is collected. Please note that the provision of certain Personal Data is required for establishing a contractual relationship with the Company. Person not wishing to provide such Personal Data will not be able to open an account with the Company or be provided with other products and/or services of the Company. We may collect, use, store and transfer different types of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, nationality, date of birth and gender;
- **Contact Data** includes billing address, email address and telephone numbers, cryptocurrency wallet address;
- **Financial Data** includes bank account and payment card details; estimated annual income and net worth; your trading experience and investment knowledge, education, source of income, investment aims and appetite, occupation, employer and employment position, investment portfolio, total cash and liquid assets and other details or questions as may be required;
- **Transaction Data** includes details about any details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method and other details of products and services you have purchased from us, Legal Entity Identifier (LEI) or any available equivalent official identifier, name, payment account number, LEI or any available equivalent official identifier of a person that is the intended recipient of the transfer of funds;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website and/or Trading Platform;
- **Profile Data** includes your username and password, your interests, feedback and survey responses;
- **Usage Data** includes information about how you use our Website, products and services; page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the Website;
- **Marketing and Communications Data** includes your preferences in receiving information and marketing from us and our third parties and your communication preferences;
- **Data included in documents that you provide to us to verify your identity**, such as your passport, utility bills, and/or bank statement or your company incorporation details.

Please note that we may also record and retain all telephone calls and other communication with us and may use it in our dealings with you, including any dispute resolution or legal proceedings.

You agree to update information and Personal Data you provided to us upon our request, if we consider the information and Personal Data provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and Personal Data and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our services to your profile based on such information and Personal Data.

### 3. Children's Data

Our website and services is not targeted to children under the age of 18 and we do not intentionally collect Personal Data from children under the age of 18. If we discover that a child under the age of 18 has provided us with Personal Data through this Website or otherwise, we will take reasonable steps to delete the Personal Data. If you believe we may have accidentally received Personal Data from a child under the age of 18, please contact us immediately.

#### 4. Use of Personal Data

We collect and process your Personal Data for one or more of the following purposes:

- for the evaluation, establishment and maintenance of the contractual relationship between the Company and you and to deliver services and products to you;
- to comply with applicable data protection legislation and applicable laws and other legal obligations (such as compliance with court orders, tax law or other reporting obligations and anti-money laundering controls);
- To comply with Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets and amending Directive (EU) 2015/849 and Financial Action Task Force Recommendation 16 (hereinafter the “Travel Rule laws and regulations”);
- To verify your identity and carry out any required credit checks;
- To understand your needs and your eligibility for products and services;
- To manage the account you holds with us;
- to administer transactions including deposits, chargebacks and payments and monitor trading activity, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities;
- process billing and collection of any fees;
- to provide you with transaction and post transaction related services;
- provide information to you about developments and new products, including changes and enhancements to the Website;
- to keep you updated on the issues that are relevant to your business relationship with us;
- to improve the Website or to customize the content and/or the layout of the Website for each individual user and to provide, maintain, improve, and develop relevant features, content, and services;
- to learn about your interests and preferences to contact you with information that is relevant to you and help us target marketing communications and advertisements for our products and services so that they are more relevant to you;
- To enhance the security of our network and information systems;
- To identify, prevent and investigate fraud and other unlawful activities, unauthorised transactions and other liabilities and manage risk exposure;
- To manage our business operations and comply with internal policies and procedures;
- To defend, investigate or prosecute legal claims;
- to review, investigate and respond to any comment or question that you may raise;
- To receive professional advice;
- To use your pseudonymised details to show you advertising for our products and services on social media platforms, such as Facebook, Twitter, LinkedIn, YouTube, Google or via other third-party advertising that may appear on other websites you use;
- for the analysis of statistical data which helps us in providing you with better products and services in the future (this data are anonymised and aggregated so that they do not directly or indirectly reveal your identity. The company may provide this statistical data to third parties solely for statistical purposes and in an effort to improve our marketing campaign.

- Your e-mail address may be used in relation to our products and services (including any marketing campaigns related to these products or services).

## 5. Links to other websites

The Website contains or may contain links to other websites or social media platforms of interest. However, once you have used these links to leave the Company's Website, you should note that the Company does not have any control over those other websites. Therefore, the Company cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Policy. Please refer to those third-party sites' privacy policies and terms of use to learn more about their privacy practices.

The Company will not be liable for the unlawful or unauthorised use of your Personal Data due to misuse and/or malicious use and/or negligence and/or misplacement of the your password either by you or any other third party.

## 6. Retention Periods

We store the Personal Data for as long as your Account is active or for as long as it is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain Personal Data will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation.

Subject to that, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we do retain certain data for longer to comply with the retention obligations of applicable laws, for example laws and regulations on taxes and the prevention of fraud and anti-money laundering.

## 7. Sharing and Disclosure of Personal Data

All the personal information you give to us shall never be disclosed to any third party without your consent. The only reason this can happen is in the following circumstances:

- where required by law to regulatory, law enforcement, or other government authorities;
- to participate in crime prevention, legal compliance, including screening and comparing such data against sanctions and other databases used for crime prevention purposes;
- information is needed to be disclosed to other related companies of ours, our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- information has already been displayed publicly by you, and as a result was known to us publicly;
- information becomes known publicly and made available generally after you have disclosed it to us and which was not caused by our actions or inactions;
- with professional advisors, vendors, consultants, and other service providers, such as payment service providers, IT hosting companies, banks, exchanges, crypto-currency

exchanges, other financial institutions and credit reporting/reference agencies who need access to such information to carry out work on our behalf;

- another business to help us to carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business;
- in cases you were introduced to our website by third party business introducer, we might share some details about your dealing with us back to the business introducer.
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our company by another company;
- if we believe your actions are inconsistent with our terms and conditions or policies, or to protect the rights, property, and safety of us or others;
- With Travel Rule technology providers, and beneficiary Virtual Asset Service Providers (VASPs) of your cryptocurrency transfers
- with selected third party marketing automation providers for marketing purposes or with third parties for the purpose of conducting verification processes on our behalf.

Use of the Personal Data and information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share Personal Data are required to protect Personal Data in a manner similar to the way we protect Personal Data.

## 8. Marketing Communications

We may use your Personal Data to offer you products and services that we believe may interest you. We will not do this if you tell us not to. If you do not wish to receive marketing offers from us, please send an email to us at [support@leadero.global](mailto:support@leadero.global)

## 9. Personal Data Rights

You may have certain rights and protections under the law regarding the processing of your Personal Data. Please note that these rights do not apply in all circumstances.

You have certain rights of access to some or all of the Personal Data we collect and hold about you at the time of request, or to have inaccurate information corrected. If you believe that your Personal Data is inaccurate, incomplete or out-of-date, you may request a correction at any time. Unless we have your Personal Data in our capacity as a third-party administrative record keeper, when you successfully demonstrate that your Personal Data is inaccurate or incomplete, we will correct or update it as required.

If you wish to exercise such rights, you should contact us using the details below.

(For clients which are current residents of European Union): You might have the right (1) to ask us about the Personal Data we hold about you, how we use it and for a copy of it, (2) to rectify any inaccurate Personal Data or complete any incomplete Personal Data, (3) of erasure, subject to our compliance with legal obligations, (4) of restriction of processing in certain situations, (5) to withdraw your consent where consent is being relied on as a lawful basis for processing, (6) to object to processing of Personal Data in certain situations and for direct marketing purposes, (7) to Personal Data portability, (8) right to lodge a complaint with the data protection authority and (8) rights in relation to automated decision-making and profiling.

There are limits to such rights where they apply and in certain circumstances we may not be required or able to meet your request, or we may only meet your request in part.

We might not provide you copies of data which would affect personal data rights of third parties without their consent.

We try to respond to all requests within 15 business days. Occasionally, it may take us longer than 15 business days if your request is particularly complex or you have made a number of requests.

All of such requests should be send to [legal@leadero.global](mailto:legal@leadero.global), the request must come from email registered in our systems, and we might ask you to additional confirmation such requests before proceeding with them.

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

## 10. Security of Personal Data

Your Personal Data is stored and kept confidential according to the legislation on the protection of personal data, and the processing thereof, applicable in the jurisdiction where we are located.

We maintain appropriate administrative, physical, and technical safeguards for protection of the security, confidentiality, and integrity of Personal Data. We limit access to your Personal Data to those who have a genuine business need to know it. Those processing your Personal Data will do so only in an authorised manner and are subject to a duty of confidentiality.

We use Secure Socket Layer (SSL) encryption technology in order to protect the Personal Data that you submit to us. We place your account information on the secure portion of our website, using firewalls and other security technology to protect our network and systems from external attacks.

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

We follow generally accepted standards to protect the Personal Data submitted to us. However, you acknowledge and accept that any services provided through the website involve transmissions over the internet and that such transmissions are therefore subject to the internet's inherent risks. You also acknowledge and accept that, as with any network, you may also be exposed to unauthorised programs transmitted by third parties, electronic trespassing and/or the failure of information and data to reach their intended destinations and/or erroneous receipt or misdirection of such information. You therefore acknowledge that we will not be liable for any breach of confidence or unauthorised access and use arising as a result of such event.

We and our service providers may transfer your Personal Data to, or store or access it in, jurisdictions that may not provide levels of data protection equivalent to your home jurisdiction.

Our services are directed to users located all over the world. The following applies to users located in the European Economic Area (EEA): the Personal Data that we receive and collect

from you may be transferred to, and stored at, a destination outside the EEA. Such countries may not have the same data protection laws as are applicable in the EEA. In the event your Personal Data is transferred to such countries, we have ensured that appropriate safeguards are put in place to protect your privacy rights and give you remedies in the unlikely event of a misuse of your Personal Data.

## 11. Amendments to this Policy

We reserve the right to change this Policy anytime without any prior notice. The most current version of the Policy will govern our processing of your Personal Data and will always be available at [www.leadero.global](http://www.leadero.global). Your continued use of our Website and Trading Platform after the date on which the changes become effective, is deemed your acceptance of those changes. You are responsible for regularly reviewing the Policy and any amendments thereof.

If we make a change to this Policy that, in our sole discretion, is material, we may notify you via an email to the email address associated with your Account. If required by law, we will request your permission or give you the opportunity to opt out of any new uses of your Personal Data.

## 12. Enquiries and Contact Details

Questions, comments and requests regarding this Policy are welcomed and should be addressed to [legal@leadero.global](mailto:legal@leadero.global) or sent in writing to: Future Finance Services LTD, Bonovo Road, Fomboni, Island of Moheli, Comoros Union. We may require that you provide additional information to verify your identity before allowing you to exercise certain rights outlined above.

## 13. Cookies

We use cookies on our website, condition of such use is defined in our Cookies Policy, which can be found on our website – [www.leadero.global](http://www.leadero.global)