



PRIVACY POLICY

GrandCapital Ltd., 2025

1. Obligations of the Company

GRAND CAPITAL (further – the Company) is obliged to provide security and confidentiality of all private information received from Clients. Privacy policy (further – Policy) explains how the Company collects, uses, shares and protects personal data of its Clients and outlines their rights regarding this data. If you are our Client and documents provided are verified, then the present Policy does not require Clients to provide any more information, aside of what is already provided to the Company. The question of safety and security of personal data of our present and future Clients as well as security of our web- site visitors has very high priority for us.

This policy complies with applicable data protection laws.

2. Information that we collect

The Company collects the Client’s personal information in order to open a Demo or a Real account and improve its services. This collected data includes:

2.1. Personal Data: that Clients indicate in statements, questionnaires and forms for opening an account: First, Last and Middle name, address, birthdate, passport data, occupation and position.

2.2. Financial Data: information such as your investment experience and risk tolerance.

2.3. Identity Verification Documents: documents that are necessary for the Client’s identification: scan-copy of the passport, utility bills and/or bank statements, business registration documents of the Client’s Company.

2.4. Payment Verification Data: documents provided by Clients for verification of money transfer: money orders, bank statements, credit card copies, etc.

Legal Basis for Processing (GDPR Compliance):

The Company processes personal data based on:

- Contractual necessity: To provide trading services.
- Legal obligation: To comply with anti-money laundering (AML) regulations.
- Legitimate interest: To improve customer service.
- User consent: When required by law (e.g., for marketing purposes).
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3. The use of personal information The Company may use Clients’ personal information in order to:

3.1. Verify Clients’ identity and prevent fraud;

3.2. Process Clients’ trading and non-trading transactions;

3.3. Provide relevant product and service updates 4. Maintain accurate Client records;

- 3.4. Keep a correct registration database with Clients' accounts;
- 3.5. Analyze statistical data in order to improve services; The Company keeps and uses personal information that Clients provide to the Company indefinitely.

Data Retention:

Personal data is retained only for as long as necessary to fulfill its purpose and comply with legal obligations. Data will be securely deleted after this period unless required for regulatory compliance.

4. Cookies and Tracking Technologies

Cookies is a small fragment of data that is sent by the web-server to be stored on the user's computer in a form of a file, so with the next Client's request web-site could extract this information. This file is resent to the web-server in http-request every time when an attempt to open a corresponding web-page is made. Cookies may be used on some pages of our website to provide our Clients with the faster and more convenient access. Most of the web- browsers allow rejecting Cookies if Clients don't want them, while allowing to visit our website without any restrictions. Cookies are not used for identification of our website visitors.

5. Data Sharing and Third Parties

The Company has the right to disclose Clients' identity information to its affiliates, Company's agents or other trusted organizations and individuals (further – trustees) only with the purpose of processing Clients trading and non-trading requests. The Company guarantees compliance with this policy by its trustees as well as their acceptance of necessary measures to protect Clients' personal information. The Company has the right to provide Client's personal information to the regulatory authorities when legally required.

The Use of information By registering an account in the Company Clients confirm that they agree with the use of personal information according to the present Privacy Policy.

6. Clients' Rights

Under GDPR Clients have the following rights:

Right	Description
Right to Access	Clients can request a copy of their personal data.
Right to Rectification	Clients can correct inaccurate or incomplete data.
Right to Erasure (Right to be Forgotten)	Clients can request data deletion unless legally required to retain it.
Right to Data Portability	Clients can receive their data in a structured format.
Right to Restrict Processing	Clients can request to limit the use of their data.
Right to Object to Processing	Clients can opt out of direct marketing.
Right to Withdraw Consent	Clients can withdraw consent for non-essential data processing.
Right to Lodge a Complaint	Clients can file complaints with relevant data protection authorities.

To exercise these rights, contact privacy@grandcapital.net

7. Data Security Measures

The Company implements appropriate technical and organizational security measures to protect personal data, including:

- Encryption of sensitive data.
- Two-factor authentication for account access.
- Regular cybersecurity audits and penetration testing.
- Immediate notification in case of data breaches.

8. Contact Information

For any privacy-related concerns, data access requests, or opt-out inquiries, Clients can contact our Data Protection Officer (DPO): privacy@grandcapital.net