



NEXUS FINTRADE[®]

PRIVACY POLICY

NEXUS FINTRADE INTERNATIONAL LTD

VERSION: 1.0 - JULY 2026

NEXUS FINTRADE INTERNATIONAL LTD
REGISTERED OFFICE: SUITE 803, 8TH FLOOR, HENNESSY TOWER, POPE HENNESSY STREET,
PORT LOUIS 11328, REPUBLIC OF MAURITIUS
LICENSE NUMBER: GB25205239 | REGISTERED AND REGULATED BY FINANCIAL SERVICES COMMISSION (THE "FSC") IN MAURITIUS

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1. Introduction

NEXUS FINTRADE INTERNATIONAL LTD (the "Company", "we", "us", or "our") is committed to protecting and respecting the privacy of its clients, prospective clients, business partners, and website visitors. The Company's registered office is at Suite 803, 8th Floor, Hennessy Tower, Pope Hennessy Street, Port Louis 11328, Republic of Mauritius (Company Registration No. [Company Registration No. 227330 GBC]). The Company operates under Financial Services Commission (the "FSC") in Mauritius License No. GB25205239 in respect of its regulated brokerage and investment technology services.

This Privacy Policy (the "Policy"), together with our Client Agreement, Terms of Business, and any other policy referred to herein, sets out how we collect, process, store, and use personal data when you use our services, our website and client portals, or otherwise engage with us.

This Policy is governed by the Data Protection Act 2017 of the Republic of Mauritius ("DPA 2017"), and, where applicable to the Company's regulated activities, the data protection and confidentiality requirements of the Financial Services Commission ("FSC") and other jurisdictions in which the Company's clients are located.

Capitalised terms used in this Policy shall, unless otherwise defined, have the meaning given to them in the Company's Terms of Business.

2. General Terms

We may update this Policy from time to time. We encourage you to review this Policy periodically. By accessing the Company's digital platforms (website, client portal, mobile applications) or by providing your personal data to us, you acknowledge that you have read and understood this Policy.

If you do not agree with this Policy, please do not proceed to access our services or provide personal data to us. If you do not agree to any amendment to this Policy, you may be required to discontinue your use of our services.

We have appointed a Data Protection Officer ("DPO") responsible for overseeing compliance with this Policy. You may contact the DPO with any queries regarding this Policy, including requests to exercise your rights, at compliance@nexusfintrade.com or by writing to the registered office above.

3. Collection of Personal Data

"Personal Data" means any information relating to an identified or identifiable individual that is collected by the Company in the course of the business relationship, including through your use of our website, client portal, and trading platforms.

3.1 Automatic Collection

When you browse the Company's website or use our platforms, we automatically collect:

- **Technical Data:** IP address, device and browser type, and operating system information, collected for IT security, system diagnostics, and website performance analysis;
- **Usage Data:** pages viewed, session duration, and navigation patterns; and
- **Cookies:** as described in Section 12 (Cookies) below.

3.2 Collection Upon Onboarding and Account Registration

When you register as a client, we collect information necessary to open and administer your account, perform transactions, and comply with our regulatory obligations, including:

- **Identification data:** full name, date of birth, nationality, and a certified copy of a valid passport or government-issued identification;
- **Proof of residence:** a certified utility bill or bank statement matching the name and address provided at registration;
- **Contact data:** email address, telephone number, and residential/postal address;
- **Financial data:** bank account details, source of funds, trading history, deposits, withdrawals, and credit information;
- **Demographic and suitability data:** occupation, employer, employment status, education, investment experience, financial background, and risk tolerance; and
- Any other personal data voluntarily provided to us, including through customer support, satisfaction surveys, or ongoing communications.

We may, in certain circumstances, collect information about you from third parties such as your financial adviser, employer, credit reference agencies, sanctions and PEP screening providers, or identity verification service providers, where you have authorised such disclosure or where permitted by law.

4. Legal Basis for Processing Personal Data

Under the DPA 2017, the Company must have a lawful basis for processing your Personal Data. We rely on the following bases, as applicable:

Contractual necessity: processing is necessary for the performance of our contract with you (e.g. opening and administering your trading account), or to take steps at your request prior to entering into a contract.

Compliance with legal obligations: processing is necessary to comply with applicable law and regulation, including anti-money laundering (“AML”), counter-terrorism financing, tax, and FSC regulatory requirements.

Legitimate interest: processing is necessary for our legitimate business interests — such as fraud prevention, system security, service improvement, and business development — provided such interests are not overridden by your rights and freedoms.

Consent: where we rely on your consent, such as for marketing communications, we will seek your specific and informed agreement, which you may withdraw at any time.

5. Use of Personal Data Collected

We use your Personal Data only as required to provide our services and to maintain the security of your account. Specifically, your Personal Data may be used to:

- enter into and perform our contractual relationship with you;
- verify your identity and conduct Know-Your-Client (“KYC”) and AML due diligence, including ongoing monitoring and investigation of suspicious transactions by our AML Compliance Officer;
- assess the appropriateness of a financial instrument, product, or transaction, and to categorise you as a retail, professional, or institutional client;
- comply with our regulatory obligations to the FSC and other applicable authorities;
- provide client support, process transactions, and manage your account;
- communicate with you regarding your account, service updates, or (with your consent) marketing and promotional material;
- conduct statistical analysis and improve the quality of our services; and
- detect, investigate, and prevent fraud, unauthorised access, and other unlawful activity.

If you do not wish to receive marketing communications, you may opt out at any time by contacting us using the details in Section 16.

6. Disclosure of Information

We do not sell, rent, or lease your Personal Data to third parties. We may, however, disclose your Personal Data in the following circumstances:

- to our regulators, including the FSC, the Mauritius Financial Services Commission, or any other competent regulatory authority, upon request;
- where required by law, court order, or to exercise or defend our legal rights before any court, ombudsman, or governmental authority;
- to our affiliates and related bodies corporate where reasonably required to provide services to you, on a need-to-know basis;
- to service providers and processors who support our business operations, including trading platform providers, identity verification and sanctions/PEP screening providers, cloud infrastructure and hosting providers, and professional advisers;
- to credit reporting or collection agencies, where reasonably required to provide our services;
- to introducing brokers or referral partners through whom you were introduced to the Company, to the extent necessary to service your account, and by providing your Personal Data to us via such an introduction, you consent to this sharing; and

- to a buyer or successor entity in the event of a merger, acquisition, reorganisation, or sale of all or part of the Company's business or assets, on the condition that the recipient honours the commitments set out in this Policy.
- to third parties to help carry out certain internal functions such as account processing, fulfilment, Client services, Client Satisfaction surveys or other data collection activities related to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose.

All third parties with whom we share Personal Data are contractually required to protect that data to a standard consistent with this Policy and the DPA 2017. We do not share information that personally identifies you with advertising or analytics partners.

7. Consent

We process your Personal Data primarily on the basis of contractual necessity, legal obligation, or legitimate interest, as set out in Section 4. Where we rely on your consent — such as for marketing communications — we will obtain your specific and informed agreement, and you may withdraw that consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

If you decline to provide Personal Data required for mandatory purposes, such as KYC and AML verification, we may be unable to open your trading account or provide you with our services.

8. Data Retention

We retain your Personal Data only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, tax, accounting, and reporting requirements.

Subject to applicable regulation, the Company will retain your Personal Data, trading records, communications, and related information for a minimum period of seven (7) years from the date of termination of the business relationship. This period may be extended where required by a competent authority or in connection with ongoing legal, regulatory, or dispute-resolution matters.

Where your Personal Data is no longer required for the purpose for which it was collected and is not subject to a statutory retention requirement, we will take reasonable steps to securely destroy or irrevocably de-identify it.

9. Your Rights in Relation to Your Personal Data

Subject to the DPA 2017 and applicable law, you have the right to:

- be informed of how your Personal Data is collected, processed, and used;
- request access to a copy of the Personal Data we hold about you;
- request correction of inaccurate or incomplete Personal Data;

- request erasure of your Personal Data, where it is no longer necessary for the purpose for which it was collected (the “right to be forgotten”), subject to our legal and regulatory retention obligations;
- object to, or request restriction of, the processing of your Personal Data in certain circumstances;
- receive your Personal Data in a structured, commonly used, machine-readable format and to transmit it to another controller (“data portability”);
- withdraw consent to processing at any time, where consent is the basis for such processing;
- object to processing carried out for direct marketing purposes; and
- lodge a complaint with the Data Protection Office of Mauritius or another competent supervisory authority.

Requests should be made in writing to compliance@nexusfintrade.com. We may request proof of identity before actioning your request. We will respond within one (1) month of receipt; this period may be extended by a further two (2) months in complex cases, in which case we will inform you of the delay and the reasons for it. We may charge a reasonable fee to cover administrative costs where permitted by law.

10. Security of Information and Data Breach Notification

We maintain technical and organizational security measures designed to protect your Personal Data against unauthorized access, alteration, disclosure, or destruction. These measures include, without limitation:

- encryption and password protection of systems and devices;
- restricted, role-based access to Personal Data;
- regular data backups and system redundancy;
- continuous monitoring of systems for unauthorized access or anomalies; and
- staff training on data protection and confidentiality obligations.

No method of electronic transmission or storage is entirely secure, and we cannot guarantee absolute security. In the event of a Personal Data breach that poses a risk to your rights and freedoms, we will notify the Data Protection Office of Mauritius within seventy-two (72) hours of becoming aware of the breach, and will notify affected individuals directly where the breach is likely to result in a high risk to their rights and freedoms.

11. International Transfers of Personal Data

As a global financial services provider, your Personal Data may be transferred to, stored, or processed in countries outside Mauritius, including jurisdictions that may not offer the same the same level of data protection. Such transfers may occur to support our operations, such as hosting data with service providers or sharing with affiliates for client support. When transferring your data internationally, we

take all steps reasonably necessary to ensure it is treated securely and in accordance with the Data Protection Act 2017 and FSC requirements. These steps including by:

- using contractual clauses approved by the Mauritius Financial Services Commission or other recognized authorities;
- ensuring recipients implement appropriate technical and organizational safeguards; and
- limiting transfers to what is necessary for the performance of our services or compliance with legal obligations.

If the transfers are required by law (e.g., to comply with regulatory requests), we will ensure they remain lawful and proportionate. For more information on the specific mechanisms we use or the countries involved, please contact our Data Protection Officer at compliance@nexusfintrade.com

12. Cookies

A “cookie” is a small text file placed on your device by our website to enable recognition of your browser and to enhance your experience. We use the following categories of cookies:

Essential cookies: required for the security and core functionality of our website and client portal.

Behavioural and analytical cookies: used to understand site usage and improve performance, including through third-party analytics providers.

Marketing cookies: used, where consented to, to deliver content and communications relevant to your interests.

You may configure your browser to accept, reject, or notify you of cookies. Please note that disabling certain cookies may affect the functionality of our website.

13. Client Obligations

As the Company is required to obtain and maintain accurate client Personal Data under applicable regulation, you are obligated to provide accurate and complete information and to promptly notify us of any changes. Failure to do so may result in the Company being unable to continue providing services to you.

14. Restriction of Responsibility

The Company is not responsible for the privacy practices or content of third-party websites linked from our platforms. Where you elect to access a linked or co-branded website, any information you provide there will be governed by that third party's own privacy policy.

15. Privacy Policy Updates

We may update this Policy from time to time to reflect changes in our practices or legal requirements. Where we make material changes, the revised Policy will be published on our website, and such publication shall constitute notice to you. We encourage you to review this Policy periodically.

16. Further Information and Queries

If you have any questions about this Policy or wish to exercise your rights in respect of your Personal Data, please contact our Data Protection Officer at compliance@nexusfintrade.com, or write to us at: NEXUS FINTRADE INTERNATIONAL LTD, Suite 803, 8th Floor, Hennessy Tower, Pope Hennessy Street, Port Louis 11328, Republic of Mauritius.