

# Smart Capital Broker Privacy Policy



At Smart Capital S.A.S. ("Smart Capital"), we are committed to protect and respect your privacy. This Privacy Policy describes how we collect, use and share your personal information when you use our web platform and/or application ("Platform").



# **Smart Capital Broker Privacy Policy**

Last updated: July 1, 2024

# 1. Introduction to Smart Capital S.A.S.

At Smart Capital S.A.S. ("Smart Capital"), we are committed to protecting and respecting your privacy. This Privacy Policy describes how we collect, use and share your personal information when you use our web platform and/or application ("Platform").

#### 2. Information We Collect

## 2.1 Information Provided by the User:

- · Registration Data: name, email address, phone number and other data required to create an account.
- · Identity verification documents: passport, driver's license or other valid identification.
- · Financial information: bank account details, credit/debit cards and other payment methods.

# 2.2 Automatically Collected Information:

- · Usage Data: information about how you use our Platform, including interactions with the Website, pages visited and links you click.
- Device Data: information about your mobile device or computer, including IP address, operating system and browser type.

## 2.3. Third Party Information:

- · Identity verification and anti-money laundering (AML) information provided by third parties.
- · Market data and analytics provided by external partners and service providers.

#### 3. Use of Information

We use the information collected for the following purposes:

## 3.1. Provision of Services:

- · To create and manage your account.
- · To facilitate and process financial transactions on our Platform.
- $\cdot$   $\;$  To provide you with customer support and resolve technical issues.





# 3.2. Legal Compliance and Security:

- To comply with legal and regulatory obligations, including those related to the prevention of money laundering and terrorist financing.
- · To protect the security of our Platform and prevent fraud.

## 3.3. **Service Improvement**:

- · To analyze the use of the Platform and improve our services and functionalities.
- · To personalize your experience and provide you with relevant content and advertisements.

# 4. Information Sharing

#### 4.1. Service Providers:

• We share information with service providers that help us operate our Platform and provide our services, such as identity verification providers, payment processing and hosting services.

## 4.2. Legal Compliance:

· We may disclose personal information if required to do so by law, a governmental or judicial authority, or if we believe such action is necessary to comply with a legal obligation.

#### 4.3. Business Transactions:

· In the event of a merger, acquisition or sale of all or part of our assets, your personal information may be transferred to the new owner.

#### 5. Information Security

We implement technical and organizational security measures to protect your personal information against unauthorized access, loss, destruction or alteration. However, we cannot guarantee the absolute security of information transmitted over the Internet.

# 6. User Rights

## 6.1. Access and Rectification:

You have the right to access your personal information and to request correction of any inaccurate data.





# 6.2. Cancellation and Opposition:

· You may request deletion of your personal information or opposition to the processing of your data in certain circumstances, in accordance with applicable law.

#### 6.3. Withdrawal of Consent:

· If you have given your consent to the processing of your personal data, you have the right to withdraw your consent at any time.

# 7. International Transfers

We may transfer your personal information to countries outside your country of residence. In such cases, we will ensure that appropriate safeguards are in place to protect your information.

## 8. Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law.

## 9. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted on this page with the date of the last update. We encourage you to periodically review this page to stay informed about how we are protecting your information.

#### 10. Contact

If you have any questions or concerns about this Privacy Policy, please contact us via email: [contact email].

Contact Address: Smart Capital S.A.S. [Address] Bogotá D.C., Colombia

