

Privacy and Data Protection Policy

GLEX Limited

Investment Dealer License SEC-2.1B, Mauritius

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Contents

1. General Provisions and Scope
2. Types of Personal Data Collected
3. Purposes of Personal Data Processing
4. Transfer of Personal Data to Third Parties
5. Protection of Personal Data
6. Client Rights Regarding Personal Data
7. Final Provisions and Amendments to the Privacy Policy
8. Terms and Definitions

1. General Provisions and Scope

1.1 GLEX Limited (the “Company”), operating under Investment Dealer License SEC-2.1B, Mauritius, places paramount importance on the protection and confidentiality of clients' personal data. The Company undertakes to process personal data strictly in accordance with the laws of the Republic of Mauritius and widely accepted international data protection standards.

1.2 This Privacy Policy (the “Policy”) describes the types of personal data collected by the Company, the purposes of such data collection and processing, methods of protection, and circumstances under which personal data may be shared with third parties, if applicable.

1.3 This Policy applies to all instances of collection and processing of personal data obtained by the Company through its official website (glexglobal.com), client portal, official communication channels, and any other platforms or methods employed by the Company in providing services and interacting with clients.

1.4 By accessing or using the Company’s services and platforms, clients explicitly agree to the terms of this Privacy Policy. Clients who do not agree with this Policy should refrain from using the Company's services.

1.5 The Company regularly reviews and updates this Policy as necessary to ensure compliance with evolving legislation and international data protection standards.

2. Types of Personal Data Collected

2.1 In the course of providing services and complying with regulatory requirements, the Company may collect and process the following categories of personal data from clients:

- **Identification data:** first and last name, date of birth, nationality, passport or other identification document details.
- **Contact information:** email address, telephone number, residential or registered address.
- **Financial information:** bank account details, payment card information, transaction history, financial status, income details, and sources of funds.
- **Data generated during the use of services:** information about trading activities, technical details about connections and devices used (IP address, operating system, browser type).
- **Data for identification and fraud prevention:** records of communications, audio and video verification materials, and other information used for security and risk mitigation purposes.

2.2 Personal data is collected only to the extent necessary and exclusively for the purposes outlined in this Policy.

2.3 Clients must provide accurate and up-to-date personal information and are required to promptly update such information in case of any changes.

2.4 The Company does not collect special categories of personal data (such as health-related data, political opinions, religious beliefs, etc.) unless explicitly required by applicable laws or regulatory authorities.

2.5 Additionally, the Company may request supplementary data necessary for compliance with Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) regulations.

3. Purposes of Personal Data Processing

3.1 The Company processes clients' personal data exclusively for the following purposes:

- Providing clients with requested services and ensuring high-quality customer service.
- Identification and verification of client-provided information.
- Compliance with legal and regulatory obligations, including Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) requirements.
- Fraud prevention, asset protection, and ensuring the security of clients' financial transactions.
- Management of client accounts, processing of payments, and execution of financial transactions.
- Informing clients about important changes related to service provision, as well as sending notifications and informational messages associated with the use of services.
- Analysis and improvement of the Company's services and products, ensuring a personalized approach to each client.
- Resolution of potential disputes, complaints, and claims submitted by clients or third parties.
- Marketing purposes, including sending newsletters, promotional offers, and other marketing communications (clients can opt-out from receiving such communications at any time).

3.2 Personal data is processed strictly in compliance with principles of lawfulness, transparency, and data minimization. Clients' personal data will not be used for any purposes other than those explicitly stated above unless the client has provided explicit consent or unless otherwise required by applicable law.

4. Transfer of Personal Data to Third Parties

4.1 The Company does not transfer clients' personal data to third parties, except when necessary for fulfilling the Company's obligations to clients or complying with applicable legal and regulatory requirements.

4.2 Personal data may be disclosed to third parties exclusively under the following circumstances:

- Governmental and regulatory authorities upon their official request, in compliance with applicable legislation.
- Banking institutions and payment systems to facilitate financial transactions and settlements.
- Service providers offering technical support, software maintenance, IT infrastructure management, as well as data storage and processing services.
- Legal advisors, auditors, and other professionals engaged by the Company, when required for fulfilling its obligations and protecting its legitimate interests.

4.3 All third parties receiving personal data are contractually obligated to maintain strict confidentiality and apply data protection measures equivalent to those adopted by the Company.

4.4 Personal data is disclosed strictly on a need-to-know basis and in adherence with the data minimization principle.

4.5 Where international transfers of personal data occur, the Company ensures compliance with appropriate data protection standards, providing adequate safeguards in line with applicable international data protection regulations.

5. Protection of Personal Data

- 5.1** The Company implements all necessary technical, organizational, and administrative measures to ensure robust protection of clients' personal data against unauthorized access, alteration, disclosure, or destruction.
- 5.2** The Company regularly reviews and updates its security systems and employs multi-layered security measures, including protection against malware, data encryption, and controlled access to personal information.
- 5.3** Access to clients' personal data is restricted solely to authorized Company personnel who require such data to fulfill their professional duties. These employees are obliged to maintain strict confidentiality and to follow comprehensive data protection protocols.
- 5.4** In the event of a security breach involving personal data, the Company undertakes immediate corrective actions, and, if required by applicable laws, promptly notifies affected clients and relevant regulatory authorities.
- 5.5** The Company provides regular training sessions for its employees on information security practices and personal data protection requirements.
- 5.6** Additionally, the Company periodically conducts internal and external security audits to evaluate the effectiveness of implemented data protection measures.

6. Client Rights Regarding Personal Data

6.1 Clients of the Company have the right to:

- Be informed about what personal data is processed by the Company, as well as the purposes and legal bases for its processing.
- Request access to their personal data held by the Company.
- Request rectification of inaccurate or incomplete personal data.
- Request deletion of personal data ("right to be forgotten") when there are no legitimate grounds for its continued storage or processing.
- Restrict processing of personal data if the accuracy of data or the lawfulness of its processing is contested.
- Object to the processing of personal data for marketing purposes and other purposes provided by applicable laws.
- Withdraw previously given consent to personal data processing when processing is consent-based.
- Request data portability, enabling them to transfer their personal data to another data controller in a structured, machine-readable format.

6.2 Clients may exercise their rights by sending a written request to the Company at support@glexglobal.com. The Company undertakes to respond to such requests within thirty (30) days from the receipt of the request, in accordance with applicable law.

6.3 If the Company refuses or partially refuses to fulfill a client's request, it will provide a clear and reasoned explanation for such refusal.

6.4 Clients retain the right to lodge a complaint with regulatory authorities if they believe their data protection rights have been violated.

7. Final Provisions and Amendments to the Privacy Policy

7.1 This Privacy Policy is an integral part of the terms and conditions under which the Company provides its services. By using the Company's services, the client acknowledges and accepts the terms of this Policy.

7.2 The Company reserves the right to periodically amend or update this Privacy Policy without prior notification, reflecting changes in legislation, regulatory requirements, or internal Company procedures.

7.3 In case of significant amendments to the Privacy Policy, the Company will inform clients by posting an appropriate notice on the official website (glexglobal.com) or via the Client Portal.

7.4 Clients are responsible for regularly reviewing the current version of the Privacy Policy published on the Company's official website. All amendments to the Privacy Policy become effective upon their publication on the Company's official website.

7.5 All questions, suggestions, and comments regarding this Privacy Policy should be directed to the Company's official email address: support@glexglobal.com.

8. Terms and Definitions

The following terms and definitions apply for the purposes of this Policy:

- **Client's Consent** – Any freely given, specific, informed, and unambiguous indication of the client's wishes by which the client signifies agreement to the processing of their personal data.
- **Data Breach** – A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.
- **Data Controller** – The Company, which determines the purposes and means of processing personal data.
- **Data Processor** – A natural or legal person processing personal data on behalf of and according to instructions from the Data Controller.
- **Data Subject** – A natural person whose personal data is processed by the Company.
- **Personal Data** – Any information relating to an identified or identifiable natural person (data subject).
- **Processing of Personal Data** – Any operation or set of operations performed on personal data, whether by automated means or otherwise.
- **Third Parties** – Any natural or legal persons, organizations, public authorities, agencies, or companies to whom personal data may be transferred for the purposes outlined in this Policy.

All terms are interpreted in accordance with the legislation of the Republic of Mauritius and international data protection standards.