



Privacy Policy

CFI International Ltd
Regulated by Financial Services Commission (FSC)

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1- Purpose

This policy establishes an effective, accountable and transparent framework for ensuring compliance with the requirements of:

- The Data Protection Act 2017 (hereafter the **"DPA"**);
- Data Protection (Designation, Tasks and Position of Data Protection Officers) Regulations 2026; and
- The European Union General Data Protection Regulation 2016 (hereafter the **"GDPR"**).

2- Scope

This Policy applies to CFI International Ltd (hereinafter referred to as "CFI", "the Company", "we", "us", or "our"). CFI holds an Investment Dealer (Full-service Dealer, excluding underwriting) Licence, C118023104 since the 14th January 2019, pursuant to Section 29 of the Securities Act 2005, Rule 4 of the securities (Licensing) Rules 2007 and the Financial Services (Consolidated Licensing and Fees) Rules 2008.

By accessing our website (<https://cfi.trade>) and using our services, the Client acknowledges and consents to his/her personal data being collected and processed by the Company.

In order to open a trading account with the Company, potential clients are required to provide some personal information during the registration process. Hence this Policy governs the handling of data subject rights requests in relation to the processing of personal data of all customers/data subjects whose personal data is processed by the Company.

3- Information Collected

The Company may collect the following information (non-exhaustive list) when potential Clients register on the website:

- Name and Surname
- Date of Birth
- Gender
- E-mail address
- Full residential address
- Phone number
- Information whether you are a Politically Exposed Person (PEP)
- Tax residence and Tax Identification Number
- Identification number, driving license number or passport number
- Photographic evidence
- Transaction details
- Date of registration
- IP address
- Geographical Location
- Bank details
- Any other required personal data

4- Use of Personal Information

All the information shared with the Company shall be treated as confidential and will be used for the following purposes:

- **Legal Obligations:** The Company is required under Mauritius regulation to collect necessary information to combat and prevent money laundering and terrorist financing.
- **Contractual Obligation:** In order for a Client to be onboarded, we have to request identifying information, as mentioned in Section 2, to verify the personal information as this is further explained in our Terms and Conditions.
- **Business Operations:** To facilitate the provision of the Company's investment services and the efficient operation of its business, including client onboarding, the opening and maintenance of trading accounts, execution of trades and investment transactions, customer support, risk management, compliance monitoring, record-keeping, and the fulfilment of regulatory and reporting obligations under applicable Mauritian laws and regulations.
- **Operation of the website:** By collecting information, we can prepare and provide a more tailored website to satisfy our clients needs.
- **Providing, promoting, and Improving our services:** Through the collection of information we can better understand our clients needs and provide them with a service more suitable to their requirements.
- **International/ Cross Border Transfer:** The Company may transfer personal data to jurisdictions in which its group companies, affiliates, or service providers are located. Appropriate technical and organisational measures are in place to ensure the security and protection of such personal data in accordance with applicable data protection law.
- **Automated Decision-Making and Profiling:** The Company may use automated tools, including AI-enabled solutions such as Sumsb, to support customer identification and verification, KYC/CDD checks, sanctions and PEP screening, fraud detection, and customer risk assessment for compliance purposes. Where automated processing may result in significant decisions, appropriate human oversight will be maintained in accordance with applicable Data Protection Laws.
- **Complaints enquiries:** to perform an enquiring concerning your complaints, we may use the data you have provided upon enquiry.
- Maintaining back-ups for our databases and keeping proper records (as this is required by law)
- **Statistical and Marketing Purposes:** if you consent to receive our marketing communication materials, we will use the personal data you have provided to send you information about our products, services, and upcoming events.
- **Client Communication:** The information you have provided us will be the method in which we communicate with our clients where that is deemed necessary.

The Client undertakes the responsibility to update us as soon as possible and no more later than the 10th day from which any of the provided information have changed. Failure to do so may lead to position closure, account closure and a report to the regulator. Clients are obliged not to impersonate any other natural person and is their responsibility to provide correct and accurate information as these are requested by the Company.

5- Method of Collection

Any information that is collected, can be done so through numerous ways including the website, mobile app, account opening and registration, demo sign ups and any information collected during customer service communications. Information may also be collected from any medium which makes information publicly available. (e.g. Social Media and other service providers)

To comply with further regulations, we may keep records of you trading activities and behaviours, including reports, statements, and trades for the following:

- Products traded on our platform and their overall performance
- Historical data and investments you have made during our time with us, including amounts invested
- Preference in the type of products

The Company maintains the right to record any communications, either electronic, by telephone, in person or other methods not limited to the aforementioned, in relation to the services provided to you and your business relationship with our Company. These communications shall constitute Company property and will be considered as evidence of our communications between us and our clients.

6- Cookies Policy

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our Website.

We may use external organisations to help manage, update, create and maintain our website, analysing all statistical data collected. Such organisations may install and use their own cookies on our behalf.

7- Storage of Personal Information

Keeping client and other information secure is of great importance to our Company and any such information held, however they may have been collected, shall remain in the Company's records throughout the period in which a client has a business relationship with us.

Records of all information may be kept in secure computer storage, paper-based files and other records, taking all appropriate measures to protect such personal information from being lost, misused, modified or disclosed.

We may maintain records for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve Client Information in connection with litigation, investigations and proceedings. Further to the time mentioned above, records will be securely destroyed and removed from our possession.

Communications between the Company and Clients will also be held for a period of up to 7 (Seven) years.

8- Data Subject Rights / Customer Rights

8.1 Rights of Access

Under Articles 16-22 of the GDPR and Sections 37-40 of the DPA, an individual has the right to obtain from the controller, confirmation as to whether personal data concerning him/her is being processed. The Company is committed to upholding the rights of individuals and has dedicated processes in place for providing access to personal information. Where requested, we will provide the requested information.

Communication of the above requested information shall be made in an intelligible form using clear and plain language. In the event the request is made by email, the Company shall provide the requested information by mail itself, unless the individual making the request indicates otherwise.

8.2 Other Rights of the Data Subject/Customer

Data subjects have the following rights:

- to rectification;
- to erasure (right to be forgotten);
- to restriction of processing;
- to be notified of rectification/erasure of personal data or restriction of processing;
- to data portability;
- to object to certain types of processing; and
- to object to automated decision making.

Requests to exercise any of the above rights may be submitted by contacting the Company's Data Protection Officer at dpo.ma@cfi.trade

Please note that the exercise of certain rights may be subject to limitations or exemptions under the DPA 2017, GDPR and any other applicable laws. In particular, the Company may be required to retain and continue processing certain personal data in order to comply with its legal and regulatory obligations, including obligations relating to anti-money laundering, combatting the financing of terrorism, countering proliferation financing, taxation, accounting, regulatory reporting, and record-keeping requirements.

9- Restriction of Responsibility

The Company does not hold any responsibility and shall not be held responsible for the Privacy Policies of any other thirdparty company, or partner that may be linked to it. The company also has no control on how Client information will be used by such third-parties or partners.

The Company shall not be liable for information provided by the client to any linked websites which are not operated by the Company. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

10- Changes and Updates to this Privacy Policy

The Company may amend or update this Privacy Policy from time to time to reflect changes in applicable laws, regulations, business practices, or the services it provides.

Where material changes are made, the updated Privacy Policy and a notice of such changes will be published on the Company's website. The continued use of the Company's services following the publication of the updated Privacy Policy shall constitute acceptance of the revised terms.

Customers are encouraged to review this Privacy Policy periodically to remain informed of how the Company collects, uses, stores, and discloses their personal information.

11- Disclosure of Information

By accepting this Privacy Policy and using the services of the Company, the Client acknowledges and agrees that the Company may disclose personal data and confidential information, including but not limited to identification documents, recordings, communications, and account details, in the following circumstances:

- Where such disclosure is required by applicable law, regulation, legal process, or by order of a competent court or authority;
- Where requested by any regulatory, supervisory, tax, governmental, or other authority having control or jurisdiction over the Company or the Client, or in any jurisdiction in which the Company operates;
- To professional advisors of the Company, including legal, tax, or audit service providers, who are bound by strict confidentiality obligations;
- To third-party service providers engaged by the Company in relation to the provision of its services, including but not limited to IT support, hosting, data storage and backup, record keeping, payment processing, customer communication, and similar operational services, provided that such third parties are contractually bound by confidentiality and data protection obligations;
- To any person or entity to whom the Company is permitted or required to make such disclosure under applicable laws and regulations. The Company will not be responsible for the subsequent handling or use of personal data by such third parties where such handling is outside the Company's control and the disclosure was made lawfully and in accordance with applicable law.

The Client understands and accepts that such disclosures are necessary for the proper functioning of the business relationship with the Company and for compliance with legal, regulatory, and operational obligations. The Company shall take all reasonable steps to ensure that any third-party recipients of Client data maintain adequate levels of data protection. Such disclosure of confidential information shall be limited to the purposes described above and shall remain valid for a period of seven (7) years, subject to automatic renewal unless otherwise agreed or required by applicable law.

September, 2026