

# **ACTIVE CORP LTD**

## **PRIVACY & COOKIES POLICY**

**June 2026**

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# 1. Introduction

ACTIVE CORP LTD is incorporated under the laws of Saint Lucia (registration number 2026-00377), with its registered office at Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia.

ACTIVE CORP LTD is being hereinafter referred to as the '**ActiveXBT**' and/ or '**the Company**'.

# 2. Purpose

This Privacy and Cookies Policy (the 'Policy') defines requirements to help ensure compliance with laws and regulations applicable to the Company in the process of collection, storage, use, transmission, disclosure to third parties and retention of Personal and special categories of personal data (also referred to as personal and sensitive personal information respectively in this policy).

# 3. Scope

This policy is applicable to all ActiveXBT past, present or potential employees, contractors, vendors, interns, customers, and business partners who may receive personal information from ActiveXBT, have access to personal information collected or processed by or on behalf of ActiveXBT, or who provide information to the Company.

This policy covers the treatment of personal information gathered and used by ActiveXBT for lawful business purposes. This policy also covers the personal information we share with authorized Third Parties or that Third Parties share with us.

# 4. Framework & Regulator

In Saint Lucia, data protection is governed primarily by the Data Protection Act 2011, as amended in 2015 and partially brought into force in 2023. The legislation establishes a comprehensive framework for the collection, processing, storage, use, and disclosure of personal data.

The law establishes the office of the **Data Protection Commissioner**, which has powers to:

- Investigate complaints.
- Conduct inspections and investigations.
- Issue enforcement notices.
- Require organizations to provide information regarding their data processing activities.

The Commissioner may issue enforcement notices requiring corrective action. Failure to comply can result in fines of up to XCD 25,000 and/or imprisonment of up to six months for certain offences. Additional penalties may apply for other breaches under the Act.

## 4.1. GDPR Compliance

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR") shall apply only if our services are directed to or accessed by users located in the European Union (EU) or European Economic Area (EEA).

When applicable, we process personal data under the following lawful bases:

- Consent (Article 6(1)(a) GDPR) – for email marketing or cookie tracking when consent is provided.
- Contract (Article 6(1)(b) GDPR) – to perform our obligations when you use our services.
- Legitimate Interest (Article 6(1)(f) GDPR) – for fraud prevention, business analytics, and improving our services.

Data subjects located in the EU/EEA have the right to access, rectify, erase, restrict, object to, or port their data. Requests can be submitted to Support teams of ActiveXBT.

### Cookies and Tracking Technologies

Our Site uses cookies and similar tracking technologies to enhance user experience, analyze traffic, and

personalize content. Cookies are small files stored on your device. You can control or disable cookies through your browser settings. If you reject cookies, some parts of the Site may not function properly.

Types of cookies we may use include:

- Essential cookies: Required for website functionality.
- Analytics cookies: To understand how users interact with the Site.
- Preference cookies: To remember your settings.
- Marketing cookies: Used for advertising and remarketing (only with consent if GDPR applies).

### Data Retention

Personal Data will be retained for as long as necessary to fulfill the purposes outlined in this Policy, or as required by law. Account-related data may be kept for at least five years following account closure to comply with recordkeeping and anti-money laundering obligations.

### Security

We take reasonable technical and organizational measures to protect personal data. However, no transmission over the internet is completely secure, and we cannot guarantee absolute protection.

### International Data Transfers

If GDPR applies, and personal data of EU/EEA users is transferred outside the EEA, we ensure adequate safeguards are in place, such as Standard Contractual Clauses or equivalent mechanisms.

### Data Processing Agreement (DPA)

Data may be processed by third-party service providers acting on our behalf under Data Processing Agreements.

## 5. Data Subject Rights

Right	Saint Lucia Data Protection Act	GDPR
<b>Right of Access</b>	✓ Individuals can request information about personal data held about them.	✓ Individuals have an extensive right of access, including processing purposes, recipients, retention periods, and safeguards for transfers.
<b>Right to Rectification</b>	✓ Individuals can request correction of inaccurate data.	✓ Individuals have an explicit right to correct inaccurate or incomplete personal data.
<b>Right to Object</b>	✓ Limited right to object to certain processing activities, particularly direct marketing.	✓ Broad right to object to processing based on legitimate interests, public interest, and direct marketing.
<b>Right to Prevent Direct Marketing</b>	✓ Specifically recognized.	✓ Explicit right to object at any time to direct marketing.
<b>Right to Erasure ("Right to be Forgotten")</b>	Limited. Individuals may seek correction or deletion in some circumstances, but there is no standalone GDPR-style right.	✓ Comprehensive right to erasure in specified circumstances.
<b>Right to Restrict Processing</b>	✗ Not expressly provided.	✓ Explicit right to restrict processing.
<b>Right to Data Portability</b>	✗ Not provided.	✓ Right to receive personal data in a structured, machine-readable format and transfer it to another controller.
<b>Rights Related to Automated Decision-Making and Profiling</b>	Limited protections regarding automated decisions.	✓ Detailed rights regarding solely automated decision-making, including profiling.
<b>Right to Withdraw Consent</b>	Not expressly developed in the same way as GDPR.	✓ Explicit right to withdraw consent at any time.
<b>Right to Lodge a Complaint</b>	✓ Complaint can be made to the Data Protection Commissioner.	✓ Complaint can be made to a supervisory authority.
<b>Right to Judicial Remedy</b>	✓ Available through the courts in certain circumstances.	✓ Extensive judicial and compensation rights.

## 6. Information Collection and Use

The Company collects the necessary information required for the Company to open, transact in and safeguard its client's accounts. ActiveXBT ensures that it only collects the necessary information required. In relation to the processing activities which the Client's personal data undergoes, the Company acts as the personal data controller of the Client's personal data collected.

To provide its services effectively and in accordance with the relevant laws and regulations, the Company gathers two types of data and information from Clients and other stakeholder (e.g., from banks and/or payment providers, and/or other sources) to construct the respective profiles based on the Client's requirements and preferences namely the Non-personal Information and Personal Information collectively referred to as "Your Data".

### Non-personal Information

It is un-identified and non-identifiable information, which may be made available or gathered via your use of the Site, even if you do not participate or register to the Company's Site. We are not aware of the identity of the Individual from which the Non-personal Information was collected.

Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

### Personal Information

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("Personal Information"). Such information includes:

- **Registration information:** When you open an account, you will be asked to provide us certain details such as: full name, e-mail address date of birth, physical address, telephone number, and other information, as further described in Client Agreement/Terms and Conditions/registration form.
- **Device Information:** We may also collect Personal Information from your device. Such information includes geolocation data, IP addresses, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **Payment Information:** To execute withdrawals and for anti-money laundering purposes, you may be required to share personal information within the site or with our trusted payment processor. Such personal information may include your name, billing address, identity number, financial information (e.g. your credit card number, bank account, etc.) and any other information that is required to perform transactions.

Based on the aforementioned, the Company collects information which is required to communicate with and identify its clients. In addition, certain demographic information, including birth date, education, occupation, etc. maybe also collected from the Company's Clients along with information related to trading so that the Company to be able to assess trading related details which are deemed to be necessary. Examples include:

- Application information that includes personal information provided by the Client in the Company's application form. The Client's name, address, date of birth, email address, income and income source is asked. This information is also used by the Company in order to communicate with the Client.
- Transaction information that includes information about the anticipated volume and value of the Client's transaction with the Company. The Client's economic profile is also construed based on this information.
- Verification information that includes the Client's identity card, passport or driver's license.

The provision of data is required from you to enable us to provide our services. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

In the course of your registration as a client, signing up with ActiveXBT or filling in any form on our Website, subscribing to our services, news or offers, marketing communications or posting material, the following information about you ("Your Data") will be collected and stored for administrative, service related and/or legal purposes.

We will limit the collection of personal information to what is necessary to administer our business and carry out activities in an effort to provide you with superior service, Information that you provide to us directly:

- Personal information, such as names, addresses, personal registration number, national identification number, passport number and email addresses etc. ("Personal Information"), and
- Financial Information, including but not limited to, trading experience and employment information for appropriateness assessment will also be collected.

However, the meaning of data provided to ActiveXBT is not limited to this. It is also personal data resulting from observation of your activities (i.e., where using a device or service).

This may include:

- History of website usage or search activities, details of your visits to our Website including, communication data;
- Traffic and location data;
- Website traffic pattern information, including IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This kind of information is only used in masked or aggregated form, which means that the individual user will not be recognizable. These data do not identify any individual.
- Communication between you and ActiveXBT via Live Chat, email, or telephone call.

Specifically, please refer to the table below for the type of data collected and the purpose of the relevant collection:

1. Personal Information includes Full Name, date of birth, address, citizenship, ID or passport number - To verify your identity using our verification processes to prevent fraud, chargebacks, or abuse of our services..
2. Contact Information including phone number and email address - In order to send you correspondence in relation to the services provided..
3. Financial sanctions and credit header information - to prevent fraud, chargebacks, or abuse of our services IP address - When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.
4. Proof of identification & proof of address - to identity verification to prevent fraud, chargebacks, or abuse of our services.

## **7. Log Data**

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze.

## **8. Retention of Personal Data**

We will retain your personal information for as long as necessary to provide our services, and to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information

at the earliest reasonable time. Under applicable regulations, we will keep records containing Client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

You can close your account any time, but for audit trail purposes, ActiveXBT shall hold personal data for a period of at least five (5) years after closing the account in order for us to comply with our record keeping obligations under the Money Laundering Regulations 2017.

At the end of that period, we will delete all personal data relating to you, unless a legal requirement requires them to keep the data for a prolonged period of time, or Data Subject has expressly consented to their data being held for an extended period of time.

## **9. Security of Personal Data**

The Company takes reasonable technical and organizational measures to prevent the loss, misuse or alteration of its clients' personal information. The Company stores all the personal information which is provided by the Clients on its secure (password- and firewall-protected) servers.

The Clients are responsible for keeping the password they use for accessing our website confidential; the Company will not ask the clients for their passwords (except when they log in to the Company's website).

The personal information which is provided by the clients to the Company is treated as confidential and shared only within the Company, its affiliates and service providers based on the service involved and are not disclosed to any third party except under any regulatory or legal proceedings. In case where such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. In such cases, the Company shall duly inform the third party regarding the confidential nature of the information.

## **10. Communications**

Your Data and especially the e-mail address may be also used by ActiveXBT in relation to promotion of its products and services (including any marketing campaigns related to these products or services).

## **11. How to opt out?**

If you do not wish to receive such marketing materials and marketing communications, you can opt-out at any time by clicking on "unsubscribe" or by sending us an email stating so.

You can submit an official request /complaint providing the following details:

1. Personal Details:
  - Name and surname;
  - Trading account number;
  - Email address;

2. Specific Details of the Request

3. Representatives

Only complete if you wish to be represented by a third party. Please note that you will be required to provide the Power of Attorney authorizing the relevant third party to act on your behalf.

- Name of the representative;
- Your relationship with the representative;
- Email address;
- Contact number;
- Postal address.

## **12. Corporate transaction**

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

## **13. Minors**

We forbid users under the age of 18 to register or trade using our services. If we become aware that a user under the age of 18 has shared any information, we will discard such information. If have any reason to believe that a child under 18 has shared any information with us, please contact us.

## **14. Limitation of Responsibility**

The Company is not responsible for the privacy policies or the content of sites to which ActiveXBT websites may link and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

## **15. Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

## **16. Changes to the Policy**

This Privacy Policy is effective as of June 2026 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time, and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

## **17. Contact Us**

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us with, or by placing a prominent notice on our website.

If you have any questions about this Privacy Policy, please contact one of our Support Team.

