

## Confidentiality Policy - Zeven Global SRL

Last Updated: May 2025

### 1. Introduction

At **Zeven Global SRL** ("Zeven Global," "the Company," "we," "our"), we understand the importance of our clients' personal data privacy. We are committed to protecting the confidentiality of your information and complying with applicable data protection laws as well as best international practices for information security.

This **Confidentiality Policy** explains how we collect, use, store, protect, and share the personal information of our clients and the measures we take to ensure the security and privacy of your data.

### 2. Information We Collect

#### 2.1. Personal Information:

We collect personal information when our clients register for our services, such as full name, email address, physical address, phone number, banking information, identification documents (e.g., passport or ID card), and any other information necessary to provide our trading services.

#### 2.2. Non-Personal Information:

We also collect non-personal information, such as platform usage data, browsing statistics, technical device data, among others.

#### 2.3. Cookies and Similar Technologies:

We use cookies and similar technologies to enhance user experience, perform usage analysis, and personalize content.

### 3. Use of Information

The information we collect is used for the following purposes:

- **Account Management:** To create, manage, and verify your account on our platform and to process trading transactions.
- **Regulatory Compliance:** To comply with "Know Your Customer" (KYC) and Anti-Money Laundering (AML) policies.

- **Customer Support:** To respond to your inquiries, provide technical support, and resolve any issues with our services.
- **Service Improvement:** To analyze usage and improve our platforms, products, and customer experiences.
- **Security:** To prevent fraud, ensure transaction security, and protect the integrity of our services.

## 4. Sharing of Information

### 4.1. With Service Providers:

We may share your personal information with third-party service providers who assist us in operating our platforms, processing payments, or verifying identities.

### 4.2. With Regulatory Authorities:

We may disclose your information to regulatory and governmental authorities to comply with our legal obligations, including KYC/AML compliance.

### 4.3. Confidentiality of Information:

We are committed to maintaining the confidentiality of your personal information and not sharing it with unauthorized third parties unless required by applicable laws or Company internal policies.

## 5. Information Security

### 5.1. Protection Measures:

Zeven Global implements reasonable physical, electronic, and administrative security measures to protect your personal information from unauthorized access, misuse, or alteration. These measures include encryption, firewalls, and industry-standard security protocols.

### 5.2. Controlled Access:

Only authorized personnel will have access to client information, and such access will be limited to essential operational needs.

### 5.3. Data Transmission:

Although we take reasonable security measures, no data transmission over the Internet or storage system is completely secure. We cannot guarantee the absolute security of your information, but we are committed to taking reasonable steps to protect it.

## 6. Your Privacy Rights

### 6.1. Access and Correction:

You have the right to request a copy of the personal information we hold about you and to request correction of any inaccurate or incomplete data.

### 6.2. Data Deletion:

You may request the deletion of your personal data unless we are required to retain it for legal or contractual reasons.

### 6.3. Restriction of Use:

You can request the restriction of the use of your data in certain circumstances.

### 6.4. Data Portability:

You may request that we provide your data in a structured, commonly used, and machine-readable format, or transfer it to another controller, if technically feasible.

### 6.5. Objection to Data Use:

You may object to the use of your data for direct marketing purposes or based on legitimate interests.

## 7. Changes to This Policy

We reserve the right to modify this **Confidentiality Policy** at any time to comply with regulatory, technological, or operational changes. Any changes will be published on our website and will take effect immediately.

## 8. Contact

If you have any questions about this **Confidentiality Policy** or the handling of your personal data, you can contact us at:

### **Zeven Global SRL**

Ruta Nacional 310, Centro Comercial Plaza Amara, 4th Floor, Local 405, San José, Costa Rica  
Email: soporte@zevenglobal.com

### **ZEVEN GLOBAL SRL**

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