

PRIVACY POLICY
ZEVEN GLOBAL SRL
Last Updated: May 2025

ZEVEN GLOBAL SRL, with registration number 3-102-891212, having its registered office at De la Escuela Alberto Paniagua, 200 meters north, white corner house on the right, Getsemaní, San Rafael, Heredia, Costa Rica, and physical address at Ruta Nacional 310, Centro Comercial Plaza Amara, 4th Floor, Local 405, San José, Costa Rica (hereinafter, "Zeven Global," "the Company," "we," or "our"), is committed to protecting the privacy of your personal data in accordance with applicable laws and international best practices. This Privacy Policy (hereinafter, "Policy") describes how we collect, use, store, process, transfer, and protect the personal information that you (hereinafter, "the Client," "you," or "your") provide to us when using our trading services, platforms, websites, applications, or any other related medium (collectively, "Services").

By registering, accessing, or using our Services, you agree to the practices described in this Policy. If you disagree with any of the provisions herein, you must immediately cease using our Services.

1. Scope of Application

1.1. This Policy applies to all personal information collected by Zeven Global in connection with the use of our Services, including but not limited to data provided during registration, identity verification, trading operations, communications with our support team, and any interaction with our platforms.

1.2. This Policy does not apply to information collected by third parties not affiliated with Zeven Global, such as external websites, applications, or services linked from our platforms, unless otherwise stated.

2. Information We Collect

2.1. Information Provided by You:

We collect data that you provide to us directly, including but not limited to:

- **Identification Data:** Full name, date of birth, gender, nationality, identification number (such as ID card, passport, or driver's license).
- **Contact Data:** Physical address, email address, phone number.

- **Financial Data:** Banking information, credit/debit card details, transaction history (deposits, withdrawals, trading operations), and any other information related to your financial activities on our platform.
- **Verification Documents:** Copies of identity documents, proof of address (such as utility bills), bank statements, or other documents required to comply with our "Know Your Customer" (KYC) and Anti-Money Laundering (AML) policies.
- **Communications:** Content of your messages, emails, live chats, call recordings (where applicable), and any other interactions with our support team.

2.2. Information Collected Automatically:

When you use our Services, we collect data automatically, including:

- **Usage Data:** Information about your activity on our platforms, such as access dates and times, visited pages, financial instruments traded, trading volume, and behavioral patterns.
- **Technical Data:** IP address, device type, operating system, browser used, unique device identifiers, approximate geolocation data (based on your IP), and connection logs.
- **Cookies and Similar Technologies:** We use cookies, web beacons, and other technologies to collect information about your interaction with our Services, improve your experience, and analyze trends. You can manage your cookie preferences through your browser settings, but disabling them may limit access to certain features.

2.3. Information from Third Parties:

We may collect data from external sources, including:

- **Identity verification service providers** to confirm the authenticity of the documents provided.
- **Financial institutions or payment processors** to validate transactions.
- **Regulatory authorities or public databases** to comply with legal obligations, such as preventing money laundering or international sanctions.

3. Purposes of Data Processing

3.1. We use your personal information for the following purposes:

- **Provision of Services:** To manage your account, process deposits and withdrawals, execute trading operations, and provide you access to our platforms and tools.
- **Regulatory Compliance:** To verify your identity and comply with our KYC/AML policies, as well as with applicable laws and regulations, including preventing money laundering, terrorist financing, and other illicit activities.

- **Security and Fraud Prevention:** To monitor suspicious activities, detect and prevent fraud, unauthorized access, and any practices that violate our Terms and Conditions (as outlined in Section 6 of the Terms).
- **Customer Support:** To respond to your queries, resolve technical issues, and provide support via email, chat, phone, or other channels.
- **Service Improvement:** To analyze usage patterns, conduct statistical studies, and optimize our platforms, products, and services.
- **Communications:** To send you notifications related to your account, updates on our services, changes to the Terms or this Policy, and, if you have given consent, promotional or marketing communications.
- **Legal Compliance:** To cooperate with regulatory, judicial, or governmental authorities when required by law or to protect our rights and legitimate interests.

3.2. We reserve the right to use your information for any other purpose that is compatible with the purposes described above, as long as it is permitted by applicable laws.

4. Legal Basis for Data Processing

4.1. We process your personal information under the following legal bases:

- **Contractual Obligation:** To fulfill our contractual obligations under the Terms and Conditions, such as managing your account and processing your trading operations.
- **Legal Obligation:** To comply with legal and regulatory requirements, such as KYC/AML regulations and applicable data protection laws in Costa Rica and other relevant jurisdictions.
- **Legitimate Interest:** To protect the security of our Services, prevent fraud, improve our platforms, and send you communications related to your account, as long as such interests are not overridden by your fundamental rights and freedoms.
- **Consent:** When you have given explicit consent, such as for receiving marketing communications. You can withdraw your consent at any time, without affecting the legality of the processing prior to such withdrawal.

5. Data Storage and Retention

5.1. Location:

Your personal data may be stored and processed on servers located in Costa Rica or any other country where Zeven Global, its affiliates, or service providers operate. We ensure that these locations comply with appropriate data protection standards.

5.2. Retention Period:

We will retain your personal information for as long as necessary to fulfill the purposes outlined in this Policy, or as required by applicable laws. For example:

- Financial transaction data and KYC/AML verifications will be kept for a minimum of 5 years, in accordance with anti-money laundering regulations.
- Usage and technical data may be retained for shorter periods unless needed for security investigations or legal compliance.

5.3. Deletion:

Once the data is no longer needed, we will securely delete or anonymize it so that it cannot be associated with you, unless retention is required by law.

6. Disclosure of Information

6.1. Within Zeven Global:

Your information may be shared internally among our departments (such as customer support, compliance, and technology) to fulfill the purposes described in this Policy.

6.2. Service Providers:

We may share your information with third parties who provide services to us, including:

- Identity verification and KYC/AML service providers.
- Payment processors and financial institutions to manage deposits and withdrawals.
- Technology service providers, such as server hosting, data analysis, and technical support.
- Marketing or advertising companies, if you have consented to receiving promotional communications.

All service providers are contractually obligated to protect your information and to use it only for the purposes authorized by Zeven Global.

6.3. Legal Compliance and Protection of Rights:

We may disclose your information to third parties in the following cases:

- To comply with a legal obligation, such as court orders, regulatory authority requests, or governmental investigations.
- To prevent or investigate illegal activities, fraud, violations of our Terms and Conditions, or threats to the security of our Services.
- To protect the rights, property, or safety of Zeven Global, our customers, or third parties.

6.4. Business Transfers:

In the event of a merger, acquisition, restructuring, or sale of assets, your personal information may be transferred as part of the transaction, provided that the recipient commits to treating it in accordance with this Policy or equivalent data protection standards.

6.5. With Your Consent:

We may share your information with other third parties if you have explicitly given your consent to do so.

7. International Data Transfers

7.1. Since we operate globally, your personal information may be transferred and processed in countries other than your place of residence, including jurisdictions that may have less stringent data protection laws than your country.

7.2. We will ensure that such transfers comply with applicable laws and that appropriate measures are implemented to protect your information, such as standard contractual clauses, data transfer agreements, or compliance certifications (e.g., the EU-U.S. Privacy Shield Framework, if applicable).

7.3. By using our Services, you expressly consent to the international transfer of your personal information in accordance with this Policy.

8. Data Security

8.1. We implement reasonable technical, organizational, and administrative measures to protect your personal information from unauthorized access, loss, misuse, alteration, or disclosure. These measures include, among others:

- Data encryption in transit and at rest (e.g., using SSL/TLS protocols).
- Strict access controls to limit access to your information to authorized personnel only.
- Continuous monitoring of our systems to detect and respond to security threats.

8.2. Despite these measures, no data transmission over the internet or storage system is completely secure. Therefore, we cannot guarantee the absolute security of your information. You acknowledge and accept this risk when using our Services.

8.3. In the event of a security breach that compromises your personal information, we will notify you in accordance with applicable laws and take necessary steps to mitigate the impact.

9. Client Rights

9.1. Depending on the applicable laws in your jurisdiction, you may have the following rights regarding your personal information:

- **Access:** Request a copy of the personal data we hold about you.
- **Rectification:** Request the correction of inaccurate or incomplete data.
- **Deletion:** Request the deletion of your personal data, unless we are required by law to retain it.
- **Restriction:** Request that we restrict the processing of your data in certain circumstances.
- **Portability:** Request that we provide your data in a structured, commonly used, and machine-readable format, or transfer it to another controller, if technically feasible.
- **Objection:** Object to the processing of your data for direct marketing purposes or based on legitimate interests.
- **Withdrawal of Consent:** Withdraw your consent at any time, without affecting the legality of the processing prior to such withdrawal.

9.2. To exercise these rights, you can contact us at Ruta Nacional 310, Centro Comercial Plaza Amara, 4th Floor, Local 405, San José, Costa Rica, or through our official digital channels. We will process your request in accordance with applicable laws and may require verification of your identity before proceeding.

9.3. We reserve the right to reject requests that are unreasonable, excessive, or contrary to our legal or contractual obligations.

10. Marketing Communications

10.1. If you have given your consent, we may send you promotional communications about our products, services, offers, or events.

10.2. You can opt-out of receiving these communications at any time by clicking on the "unsubscribe" link in our emails or contacting us directly. This will not affect communications related to your account, such as transaction notifications or policy updates.

11. Minors

11.1. Our Services are not directed at individuals under 18 years of age or minors as defined by the laws of your jurisdiction. We do not knowingly collect personal information from minors.

11.2. If we discover that we have collected data from a minor without verifiable parental consent, we will delete this information immediately. If you believe we have collected data from a minor, please contact us so we can take the necessary steps.

12. Links to Third-Party Sites

12.1. Our platforms may contain links to third-party websites, applications, or services not operated by Zeven Global. We are not responsible for the privacy practices of these third parties.

12.2. We recommend reviewing the privacy policies of any third-party site or service before providing them with your personal information.

13. Changes to This Policy

13.1. We reserve the right to modify this Policy at any time, at our sole discretion, to reflect changes in our practices, legal requirements, or technological advancements.

13.2. The changes will take effect immediately upon posting on our website or notification through any means we consider appropriate (such as email or platform messages).

13.3. Continued use of our Services after such modifications constitutes your express acceptance of the updated Policy. If you do not agree with the changes, you must cease using our Services immediately.

14. Contact

14.1. If you have any questions, concerns, or requests related to this Policy or the processing of your personal information, 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

14.2. We will respond to your request within the timeframes established by applicable laws, generally within 30 days, unless more time is needed due to the complexity of the request.

15. Final Provisions

15.1. This Policy is an integral part of the Terms and Conditions of Zeven Global SRL and should be read in conjunction with them.

15.2. In the event of a conflict between this Policy and applicable laws, the legal provisions will prevail, and we will adjust our practices accordingly.

15.3. If any provision of this Policy is found to be invalid or unenforceable, the remaining provisions will remain in full force and effect.

ZEVEN GLOBAL SRL

Effective Date: May 2025