



## **1. Who we are**

NBN Broker Ltd. (“NBN Broker” or “we”) is headquartered at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands, MH96960.

## **2. What information we collect about you.**

### **2.1 Information you give us**

We collect information you enter when using our website and when you apply to open an account with us. The information you give us may include your name, address, email address, phone number, date of birth, tax identification number, bank account and other financial details, copies of personal identification documents (such as your passport or driving licence) and photographs or other descriptions of your likeness. We also collect information when you voluntarily complete client surveys, provide feedback, apply for special offers and promotions, enter into competitions or register to our events (such as seminars and webinars).

### **2.2 Information we collect or receive from other sources.**

When you visit our website we may collect or receive your IP address, URL, browser information, plug-in types, operating system and platform as well as your login information. We work closely with third parties (e.g. business partners, technical, payment and delivery service providers, advertising networks, tracking and analytics providers (including Google), data aggregators, lead generation agencies, public sources, third party social networking sites and search information providers) and may receive information about you from them. Such information may include your clickstream through our website, the products you viewed and the page interactions, your personal contact information (if you are referred to us by an introducing broker or a friend), any personal data that is part of your profile on a third-party social network (e.g. Facebook) and that you allow that third party social network to share with us (e.g. name, email address, gender, birthday, city, country, interests, profile picture, user ID, friend list). You can learn more about the data that we may obtain about you by visiting the website of the relevant third-party social network. We may also receive personal data about individuals when we acquire other companies.

### **2.3 Information we collect using cookies**

We, or our third-party providers, may also use cookies to collect information about you. This helps us to provide you with a good experience while you use our website. See section 5 of this Policy for more details.

## **3. How we use the information about you**

We use the information about you to carry out our obligations arising from the laws and regulation applicable to us or any contracts entered into between you and us and to provide you with the information, products and services that you request from us (e.g. to establish and manage your account with us or register you to our events); to provide you with customer service, including response to your inquiries or complaints; to provide you with marketing information about other goods and services we offer that are similar to those that you have already purchased or enquired about if you have agreed to receive such information through an opt-in mechanism or as an existing customer; or to keep you up to date about general NBN Broker news. We also use your information collected from the website to personalize your repeated visits to our website. To that effect, we may combine data collected from one

source (e.g. a website) with data collected from another source (e.g. an offline event), so as to provide us with a more complete view of you as a customer and serve you better and with greater personalization, such as: improving and personalizing your experience on websites; improve our offers; provide you with marketing communications where you have opted-in to receiving such communications (unless you are an existing customer, in which case you may always opt out of such communication in the future at any time). This being said, within the limits set by the law or the contract you have signed with us, we may be allowed to share your information with affiliated companies within the NBN Broker, third party service providers, business partners (such as introducing brokers, assets managers, banks and other financial institutions), judicial bodies or regulators. We only collect the minimum amount of data needed and use anonymized data in our profiling activities. We will retain your information for as long as needed to provide you with our services or as long as your account is active. We may also retain and use your information in order to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our agreements.

## **4. Your rights**

### **4.1 Access to your information, correction and erasure**

Upon your request, we will send you a copy of the information that we hold about you. This will be provided to you without undue delay in a structured, commonly used and machine-readable form. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. If we hold personal information about you and you want it to be removed from our database or inactivated, please contact us.

### **4.2 Object to processing and right to opt-out of marketing communications**

You have the right to ask us not to process your personal data. You can exercise your right to object by contacting us at. If you wish to opt out of marketing, our emails will also have an 'unsubscribe' option.

### **4.3 Links to other websites**

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please be aware that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **4.4 Complaint**

You always have a right to lodge a complaint with a supervisory authority or directly to us by sending an e-mail.

## **5. Cookies**

### **5.1 What are cookies?**

Cookies are small text files placed on your computer, smartphone or other device when you visit our website. They allow us to distinguish you from other users, which helps us give you an enhanced website experience. Cookies allow you to do many things such as log on to your account, apply for products and services online and use financial tools.

## **5.2 What cookies do we use?**

We use three types of cookies on our website: essential cookies, performance cookies and tailored content cookies. Essential cookies enable you to operate vital functions of our website and trading platform. If these are disabled, you may not be able to access the platform or other significant parts of the website. Performance cookies allow us to recognize and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way our website works, for example by making sure users are finding what they need easily. Tailored content cookies allow us to tailor the content of our website to suit you and link with other websites, such as social media websites. For example, instead of displaying promotional messages about products you already have, they let us show you other services you might be interested in. We only use tailored content cookies subject to your prior opt in to that effect and as set by our trusted business partners to provide you with NBN Broker products and services and will only show you NBN Broker branded advertisements on our website. For more information about cookies, visit [allaboutcookies.org](http://allaboutcookies.org).

## **5.3 How to disable cookies**

When you visit our website, we will ask for your permission to use cookies. If you wish to disable all cookies, you can do this through your browser settings. However, please be aware that cookies are often used to enable and improve certain functions on our website. If you choose to opt-out of certain cookies, it is likely to affect how our website works. For more information about how to disable cookies, including instructions on how to amend your cookie settings for a variety of browsers and how to delete existing cookies from your device, visit [allaboutcookies.org](http://allaboutcookies.org).

## **6. Data Security and retention**

In order to keep your personal data secure, we have implemented a number of security measures, including: securing our operating environments that are only accessible to our employees, agents and contractors on a need-to know basis; encrypting each and every sensitive financial information processed to carry out transactions over our websites; verify your identity before you can access, use or make changes to your account so as to prevent any unauthorized access. Please note that these protections do not apply to personal data you choose to share in public areas such as on community websites. We will only retain your personal data for as long as it is necessary for the stated purpose, taking into account also our need to answer queries or resolve problems, provide improved and new services, and comply with legal requirements under applicable laws. This means that we may retain your personal data for a reasonable period after your last interaction with us. When the personal data that we collect is no longer required in this way, we destroy or delete it in a secure manner.

## **7. Changes to our privacy and cookies policy**

We keep our Privacy and Cookies Policy under regular review and consequently, it may change at any time in the future. We will place any updates on our website.