



PIPSTER MARKETS LLC

Precision Trading. Global Reach. Trusted Excellence.

CLIENT AGREEMENT

DATA PROTECTION & PRIVACY POLICY

Effective Date: August 2024 • Last Revised: August 2024

REGISTERED OFFICE

P.O. Box 1510, Beachmont, Kingstown,
St. Vincent and the Grenadines

WEBSITE

www.pipstermarkets.com

SUPPORT

support@pipstermarkets.com

DATA CONTROLLER • PRIVACY COMPLIANT

YOUR PRIVACY MATTERS — PLEASE READ THIS POLICY CAREFULLY

This Privacy Policy explains how Pipster Markets LLC collects, uses, stores, and protects your Personal Data. By using our Services or Website, you accept the terms of this Policy.



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SECTION 1

INTRODUCTION

YOUR PRIVACY IS IMPORTANT TO US

Pipster Markets LLC is committed to protecting the security and privacy of your Personal Data. This Privacy Policy outlines what information we collect, how we use and safeguard it, and with whom we may share it.

Pipster Markets LLC (hereinafter the "**Company**," "**we**," "**our**," or "**us**") is a company incorporated under the laws of St. Vincent and the Grenadines, with its registered address at **P.O. Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines**.

The protection of the security and privacy of your Personal Data is important to us and to the way we conduct our business in compliance with applicable laws on privacy, data protection, and data security.

This Privacy Policy, together with our Terms and Conditions and any additional provisions incorporated by reference, applies to your use of our Services, our Website accessible at **www.pipstermarkets.com**, and any services accessible through the Website and our products (collectively referred to as the "**Service**").

The purpose of this Privacy Policy is to outline what information the Company may collect, how it uses and safeguards that information, and with whom we may share it. Please read this Policy carefully before submitting any Personal Data or using our Services. By using our Services, you accept the terms of this Policy.



SECTION 2

WHO WE ARE - DATA CONTROLLER

Pipster Markets LLC is the **data controller** and is responsible for your Personal Data. As data controller, we determine the purposes and means of the processing of your Personal Data.

Our full contact details are as follows:

Company Name	Pipster Markets LLC
Registered Address	P.O. Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines
Website	www.pipstermarkets.com
Email Address	support@pipstermarkets.com
Role	Data Controller

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out above.

SECTION 3
PERSONAL DATA
3.1 Information We Collect

(1) We collect the following categories of personally identifiable information ("**Personal Data**"):

Category	Data Collected
Personal Details	Full name, email address, gender, home address, phone number, date of birth, nationality, signature, utility bills, photographs, and video recording.
Contact Information	Email address, country, region.
Sensitive & Biometric Data	Biometric information where permitted by law or with consent, such as facial scan data extracted from a selfie or video, compared against a government-issued identity document for verification purposes.
Government Identifiers	Passport, national identification number, national identity card details, driver's license numbers.
Financial Details	Assets, liabilities, income, expenses, bank account information, payment card information, source of funding, source of wealth, job title, salary/wage rate.
Taxation Information	Tax file number and applicable tax identification details.
Location Data	Broad location data including country of location.
Browsing Information	IP address, geolocation, browser type and version, operating system.
Device Data	Device manufacturer, operating system, CPU, RAM, browser type and language, current time.
Usage Data	Data collected through cookies and similar tracking technologies.
Marketing & Research	Advertising and analytics data including web history, content preferences, and mobile device information.
Trading Experience	Information relating to previous trading experience, personal goals, and investment objectives.

(2) Account and Personal Area passwords are stored in encrypted form and are not accessible to Company employees who do not require access for service provision.

(3) Through its Website, the Company will not collect any Personal Data unless you voluntarily choose to provide it. If you do not wish your Personal Data to be collected, please do not submit it.

(4) We will process your Personal Data lawfully and fairly and will not use it outside the purposes of which we have informed you, including selling it individually or in the aggregate for commercial use.

(5) We retain Personal Data in an identifiable format for the minimum time necessary to fulfil our legal or regulatory obligations and for our business purposes. If your account is deleted, we may mask Personal Data but reserve the right to retain and access data for as long as required by applicable law.

(6) We collect, use, and share aggregated data for any purpose. Aggregated Data does not directly or indirectly reveal your identity. However, if Aggregated Data is combined with Personal Data in a way that identifies you, we treat the combined data as Personal Data subject to this Policy.

3.2 KYC Data

During the Know Your Client (KYC) process, we are required by law to collect certain documentation to verify your identity. This may include:

- proof of identity in the form of government-issued identity documents;
- proof of permanent residential address (utility bill or equivalent issued within 3 months);
- payment card details - both sides of the card. The front must show the first 6 and last 4 digits, cardholder name, expiry date, and signature. The CVC/CVV must be covered on the reverse. Card data is not stored by the Company - we rely exclusively on certified Payment Providers.

3.3 How We Acquire Your Data

(1) Personal Data may be collected from the following sources:

- directly from you, via forms, account registration, correspondence, or other communications;
- cookies stored in your browser by our Website;
- IP address and technical connection data;
- third parties and publicly available sources.

(2) We may combine data collected from you directly with information collected via our Services and third-party sources.

3.4 Purposes of Processing

We collect and process Personal Data for the following purposes:

- (1) to authenticate your access to an account and verify your identity;
- (2) to manage your account and keep you updated on all matters concerning your account;
- (3) to provide the Services you have requested, including processing transactions;
- (4) to respond to your enquiries and contact you about questions submitted to customer service;
- (5) to provide the functionality of our products and Trading Platform;
- (6) to inform you about changes to our Services and other important service-related notices;
- (7) to protect our rights and interests, as well as the rights and interests of our Clients;
- (8) to carry out any actions for which we have received your consent;
- (9) to perform research and analysis about your use of our products, services, or content;
- (10) to comply with applicable legal or regulatory obligations, including requests from law enforcement or governmental authorities;
- (11) to fulfil our contractual obligations;
- (12) to communicate with you, directly or through partners, including for customer service, updates, and marketing;
- (13) to tailor the Website and our Services to your needs and interests;
- (14) to create anonymous statistical data for business improvement purposes;
- (15) to prevent and investigate fraudulent or other criminal activity;
- (16) to offer you personalised and/or unique offers, services, and products.

SECTION 4
DISCLOSURE OF INFORMATION
4.1 To Whom We Disclose Information

(1) Your Personal Data may be disclosed to the following categories of recipients:

Recipient	Examples	Purpose
Our Affiliates	Any affiliated legal entity.	Providing basic Services; customer support; any other purpose deemed necessary.
Financial Institutions	Banks and similar organisations.	Providing basic Services; complying with legal obligations.
Introducing Brokers / Partners	Contracted partners providing administrative, financial, or other services.	Providing basic Services; notifying Partners of registrations; communicating with Clients for customer service and marketing.
Auditors & Legal Advisers	Any entity conducting an audit or legal/financial review.	Complying with legal obligations under applicable laws.
IT & Hosting Providers	Web hosting and IT providers.	Providing basic Services.
Payment Partners	Payment processors and gateways.	Enabling payment and withdrawal processing. These processors may use your data per their own privacy policies.
Analytics & Research	Analytics platforms, call centres, marketing agencies.	Creating analytics; conducting advertising, marketing, and research; personalising Services.
Advertising Partners	Any advertising partners.	Conducting advertising and marketing activity; personalising Services.
Corporate Transaction Parties	Relevant parties in corporate sales, mergers, or reorganisations.	Personal Data may form part of transferred assets in corporate transactions.
Regulatory Authorities	Any competent authority.	Compliance with legal obligations imposed by applicable laws.

(2) **We will never sell your Personal Data.** We require any third-party service provider with whom we share Personal Data to respect your right to privacy and comply with applicable Data Protection Principles.

(3) In cases where the Client is attached to a Partner (Introducing Broker), such Partner may have access to the Client's information. The Client hereby consents to such sharing. We provide Partners only the minimum data necessary for the purpose of the Partner Agreement.

4.2 Third-Party Sites

Pipster Markets LLC cannot be held responsible for the privacy practices of other websites. We advise all visitors to read the privacy statements of every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by the Company through its own Website and Services.

4.3 Payment Providers

In accordance with the recommendations of the Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer Security (TLS 1.2) encryption and AES encryption with a 256-bit key at the application layer. Customer card data is not stored in the Company's systems. The Company relies exclusively on PCI DSS-certified Payment Providers for all card data storage and processing.



4.4 International Transfers

(1) The Company operates globally and may transfer your Personal Data to counterparties in different countries, including those outside your country of residence. The Company takes all necessary steps to ensure an adequate level of Personal Data protection in each case. However, the laws of destination countries may differ from those in your jurisdiction.

(2) Where we transfer, store, and process your Personal Data internationally, we will ensure that appropriate safeguards are in place to ensure adequate protection. Further details regarding the relevant safeguards can be obtained from us upon request at support@pipstermarkets.com.

SECTION 5

CONSENT

5.1 General Consent

CONSENT NOTICE

By submitting Personal Data or using the Company's Services, you expressly accept the terms of this Privacy Policy. You may withdraw your consent at any time, though such withdrawal will not be retroactive.

- (1) By submitting Personal Data or using the Company's Services, you expressly and voluntarily accept the terms and conditions of this Privacy Policy. You have the right to withdraw your consent and manage your information by changing your account settings or closing your account. However, withdrawal of consent will not be retroactive.
- (2) The Company does not sell, rent, or disclose your Personal Data in exchange for money or other valuable consideration to any third parties, and will not introduce such practice without providing you with a clear and explicit opt-out mechanism.
- (3) You consent to the transfer of your Personal Data to third parties as described in Section 4.1 of this Privacy Policy, including to carry out your instructions, to provide our Services, and for the purpose of notifying a Partner of a Client's registration or detachment, unless otherwise required by law.
- (4) We may display the Personal Data you select on your profile page in accordance with your account settings. Such Personal Data may be visible to other Clients of the platform.

5.2 Marketing Communications

- (1) If you provide your email address and agree to this Privacy Policy, the Company and its partners may send you marketing emails. You may opt out at any time by following the unsubscribe instructions included in every marketing email. To opt out of more than one email address, you must submit a separate request for each.
- (2) If you provide your telephone number and agree to this Privacy Policy, the Company and its partners may contact you by text or telephone. You may opt out of such communications at any time by emailing support@pipstermarkets.com.

SECTION 6

YOUR LEGAL RIGHTS

In accordance with applicable law, you may have the right to exercise the following rights in respect of your Personal Data. To exercise any of these rights, please contact us at support@pipstermarkets.com.

(1) Right of Access

You may request access to your Personal Data at any time. The Company will provide access by supplying copies of the information, allowing inspection, or providing an accurate summary. Evidence of identity may be required before access is granted. The Company will endeavor to respond within fourteen (14) days. In the event access is refused, an explanation will be given. Fees may apply to requests involving a significant volume of information.

(2) Right to Rectification

You may request correction of your Personal Data where it is inaccurate, incomplete, or out of date. Please notify the Company promptly if any details change. The Company will take all reasonable steps to correct inaccurate information.

(3) Right to Erasure

You may request the deletion, anonymization, or blocking of your Personal Data by contacting support@pipstermarkets.com. The Company undertakes to perform the deletion within thirty (30) calendar days of a valid request. Under certain circumstances, the Company may be required to continue processing Personal Data in accordance with applicable law.

(4) Right to Restriction

You may request the restriction of, or object to, our processing of your Personal Data in certain circumstances, including where you contest the accuracy of the data or where processing is unlawful.

(5) Right to Withdraw Consent

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

(6) Right to Data Portability

You may request to receive an electronic copy of the Personal Data you have provided to the Company in a structured, commonly used, and machine-readable format, and to transmit that data to another controller where technically feasible.

(7) Right to Be Informed

You have the right to be informed about the third parties with which your Personal Data has been shared and the purposes for which it has been shared.

(8) Right to Review Automated Decisions

You have the right to request review of decisions taken exclusively on the basis of automated processing - including profiling - where such decisions produce legal effects or similarly significantly affect you.

SECTION 7

SECURITY

7.1 Retention of Records

(1) We may be required to retain and use your Personal Data to meet our legal obligations for purposes including:

- compliance with applicable laws and regulations;
- responding to requests from courts and/or other public and governmental authorities;
- monitoring through compliance and anti-money laundering processes.

(2) Retention periods are determined by reference to the type and purpose of information collected, bearing in mind applicable legal requirements. The Company will not retain information for longer than necessary.

(3) Under applicable regulations, the Company will keep records containing Personal Data, trading information, account opening and verification documents, communications, and any other information relating to the Client for a maximum of **seven (7) years** after termination of the Agreement. In any event, we will keep your information for a minimum duration as provided in the applicable Limitation of Actions Law.

7.2 Security Measures

(1) The Company takes appropriate technical and organisational precautions to ensure the security of your Personal Data and strives to keep it accurate.

(2) We act with care to protect your Personal Data from loss, destruction, falsification, manipulation, and unauthorised access or disclosure. We have developed and maintain security procedures to safeguard Personal Data against loss, theft, copying, and unauthorised use and/or modification.

(3) Access to Personal Data is limited to Company employees and authorised service providers who require such access to perform their functions in connection with the provision of our Services.

(4) While the Company uses all reasonable efforts to safeguard your Personal Data, you acknowledge that the use of the internet is not entirely secure. The Company cannot guarantee the security or integrity of any Personal Data transferred via the internet.

SECTION 8

GENERAL PROVISIONS

8.1 Changes to This Privacy Policy

This Privacy Policy may be modified from time to time. To indicate any changes, we will adjust the 'Last Revised' date at the beginning of this document. The updated Policy may be displayed on-screen, and you may be required to read and accept it to continue using the Service. Continued use of our products and services constitutes your acceptance of any changes.

8.2 Compliance with Applicable Legislation

The Company is committed to complying with all applicable privacy and data protection laws and regulations designed to protect your Personal Data, including applicable data protection legislation in St. Vincent and the Grenadines and other applicable regional and national privacy laws worldwide as they become effective.

8.3 Prevailing Language

This Privacy Policy and the Company's other legally binding documents are drawn up in English. Any translation provided is for convenience only. In the event of a conflict between a translation and the English version, the English version shall prevail in all respects.

8.4 Questions, Problems, or Complaints

(1) If you have any questions, concerns, or complaints regarding this Privacy Policy or the manner in which the Company processes your Personal Data, please contact us:

Email	support@pipstermarkets.com
Website	www.pipstermarkets.com
Address	P.O. Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines

(2) We are committed to addressing your enquiries promptly. If you are not satisfied with the Company's response, you may have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction.

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P.O. Box 1510, Beachmont

Kingstown, St. Vincent and the Grenadines

support@pipstermarkets.com

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