

## Online privacy policy

For website users residing in the European Union

last updated and effective: August 21, 2020

### 1. Who is collecting my personal data?

Capital Markets Elite Group Limited (“us,” “we,” or “our”) is a registered Broker Dealer with the Trinidad and Tobago Securities and Exchange Commission. Our address is: Albion Plaza, 22-24 Victoria Avenue, Queens Park Savannah, Port-of-Spain, Trinidad and Tobago.

We offer and maintain the website located at [www.cmelitegroup.com](http://www.cmelitegroup.com), including all subdomains and subparts, as well as our social media accounts, mobile apps, platforms, affiliates or communications channels (collectively, the “Site”). When you visit the Site, you may choose to provide us with personal data that identifies you. This Privacy Policy explains how we process and use your personal data, and it applies regardless of how you access the Site. Please take time to read this Privacy Policy carefully.

### 2. What personal data do you collect?

When you provide it to us, we collect information that identifies you (“Personal Data”), such as your:

- Name
- Email address
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Age or date of birth
- Gender
- Occupation
- Assets and income
- Trading knowledge and experience
- Usernames and passwords
- Information about your account(s) e.g. account history, activity and orders
- Payment information
- Social security number, national insurance number, passport number or other national identifiers
- Transaction reporting reference
- Power of attorney/agent details
- Content of your email messages to us

When you visit the Site, we collect data from the device or browser through which you access the Site (“Log Data”), such as:

- Your internet protocol (“IP”) address

- Browser type
- Browser version
- Phone device type
- Operating system ID
- Device ID
- Cookies
- GUID (Globally Unique Identifier) /UUID (Universally unique identifier)
- Statistics on your activities on the Site (such as the date and time of visits, the pages viewed, time spent at the Site)
- Information about how you came to the Site
- Data collected through Cookies or other similar technologies discussed in more detail in our Cookie Policy.

Much of the Log Data does not identify you personally. However, we may associate the Log Data with your Personal Data. When we do, we will treat any such combined data as Personal Data until such time as it can no longer be associated with you or used to identify you.

### 3. What is the lawful basis for processing my personal data?

We collect your Personal Data after receiving your explicit consent to do so. You provide this consent by checking the box prompt before submitting your data to us.

### 4. How do we use your personal data?

We use your Personal Data for the purposes for which you provided it, including to:

- fulfill your service needs;
- register your online account;
- offer information about our services;
- maintain our own accounts for billing and delivery of services;
- advise you about products, services, offers, or events that may be of interest to you; and
- provide customer service to you.

We may also use your Personal Data or Log Data to administer our internal business activities, including to:

- design and arrange Site content and functionality in the most user-friendly manner;

- better understand customer trends and requirements and visitors to the Site;
- create non-personally identifiable data to be used for marketing;
- manage your account; and
- provide a service that is reliable, responsive, and efficient.

In addition, we may use third-party services and advertising networks, such as Google Display Network or Google Analytics, that collect, monitor, and analyze Log Data to deliver online behavioral advertising that serves ads to you on our behalf on other sites throughout the Internet. We may also contract with third-party vendors to communicate with customers who we think may be interested in our products or services.

## 5. How do you share my personal data?

### No sale of personal data

We will not sell your Personal Data to third parties, including third-party advertisers. There are, however, certain circumstances in which we may disclose, transfer, or share your Personal Data with certain third parties after obtaining your consent.

### Sharing personal data with affiliates, successors, and agents

For purposes consistent with this Privacy Policy, we may share your Personal Data with:

- our affiliates;
- successors who acquire your Personal Data if we sell, merge, reorganize, dissolve, or similarly change our ownership or corporate structure;
- other companies we engage to perform business-related functions, such as:
  - vendors who provide services to our customers;
  - marketing agencies;
  - database service providers;
  - backup and disaster recovery service providers;
  - email service providers; and
  - payment processors.

Third parties with whom we share your Personal Data have agreed not to retain, use, or disclose it, except as necessary to perform services for us.

### Sharing data through social media

We may work with social media sites like Facebook and Google, and with application developers who specialize in social commerce so you can connect to us, share your interests, express opinions about services, and generate interest in our services among members of your social networks.

Using these integrated tools enables you to share your Personal Data with other individuals or the public, depending on the settings that you have established with social networking websites. If you use third-party social media features available on our Site, we or the third party may collect or share your data, including your Personal Data.

If you do not want us to be able to access information about you, including Personal Data, from third parties, you must limit data collection and disclosure in the privacy settings on websites not operated or controlled by us ("Third Party Sites"). We reserve the right to remove the Personal Data or other data of any person for any reason we, in our sole discretion, deem appropriate.

### Legally-compelled disclosure of personal data

We may disclose your Personal Data if required to do so by law or in our good-faith belief that such action is necessary to:

- comply with a legal obligation;
- protect or defend our rights, interests, or property, or that of third parties;
- prevent or investigate possible wrongdoing in connection with the Site;
- act in urgent circumstances to protect the personal safety of users of the Site or the public; or
- protect against legal liability.

## 6. What are my rights about the processing of my personal data?

Unless subject to an exemption under the General Data Protection Regulation ("GDPR"), you have the following rights:

- **Consent:** You have the right to withdraw your consent to the processing of your Personal Data at any time.
- **Access:** You have the right to access a copy of your Personal Data that we hold about you.
- **Accuracy:** You have the right to correction of any inaccurate or out of date Personal Data.
- **Portability:** You have the right to our transmission of your Personal Data directly to another data controller, where possible and applicable.
- **Deletion:** You have the right to delete your Personal Data when we no longer need it.
- **Object:** You have the right to object to the processing of your Personal Data, where applicable.
- **Restriction:** You have the right to restrict further processing of your Personal Data, where there is a dispute as to the accuracy or processing.
- **Complaint:** You have the right to lodge a complaint with the Information Commissioner's Office.

To exercise any of these rights, please email us at [privacy@cmelitegroup.com](mailto:privacy@cmelitegroup.com) or use our form at <https://www.cmelitegroup.com/contact-us> with the phrase "Privacy Opt-out" in the subject line, and specify what you would like us to do (for example, Send me my data, Correct my data, Delete my data, Restrict use of my data, etc.). To stop email communications from us, you can also follow the unsubscribe instructions set forth at the bottom of our promotional e-mail messages. You may also access and correct some of your Personal Data by logging into your online account, if you have one. If you choose to limit our use of your Personal Data, you may not have access to certain functionality of the Site, such as promotions, product information, services or opportunities.

You can contact the Information Commissioners Office at 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can also contact a data protection authority or other official within your jurisdiction.

## 7. Is my personal data secure?

We comply with our obligations under the GDPR by: keeping Personal Data up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting Personal Data from loss, misuse, unauthorized access and disclosure, alteration, and destruction; and ensuring that appropriate technical measures are in place to protect Personal Data. However, no network, server, database, or Internet or e-mail transmission, is ever fully secure or error free. Therefore, you should take special care in deciding what Personal Data you send to us electronically.

## 8. How long will you keep my personal data?

We will retain your Personal Data as long as necessary to carry out the function for which you provided it to us, including maintenance of your account. You may close your account, unsubscribe to emails, and otherwise limit our use of your Personal Data by contacting us. However, unless you also request deletion of your Personal Data, we may retain it for eighteen months from the date we last received confirmation of your Personal Data. For example, we will retain your email address for eighteen months from the date you last opened one of our emails. Even if we delete your Personal Data, it may persist on backup or archival media for three years. Furthermore, we are legally obligated to retain certain Personal Data, such as records of your transactions, for longer periods of time.

## 9. How do you use cookies?

### What are cookies?

A cookie is a piece of information that is placed on your web browser or device when you access and/or use the Site. Cookies store text and can later be read back by the Site or third parties. Cookies can remember the information you access on one webpage to simplify

your subsequent interactions with the Site or to use the information to streamline your transactions on related webpages.

### What do you use cookies for?

We use cookies to recognize your browser and you as a unique visitor to the Site through an anonymous unique identifier. We use cookies to:

- monitor and analyze how you use the Site;
- remember your preferences to make your online experience easier and more personalized;
- route Site traffic to effectively distribute the Site workload across servers; and
- test new features.

In the future, we may use cookies placed by third parties to deliver focused online banner advertisements to you both on and off the Site.

### How can I manage cookies?

You can manage cookies through your web browser's option settings. You may be able to be notified when you are receiving new cookies and disable or delete cookies. Please refer to your web browser's help section for information on whether you can and how to do this.

Many of the third party technologies that enable targeted banner advertising also allow you to opt out. Such third party service providers include Adroll, Rubicon, Google, Media Math, Perfect Audience, Quantcast, Retargeter, and Yahoo! among others. You can control your preferences directly with each such third party service provider.

You can learn more about cookies at the following third-party websites:

- All About Cookies: <http://www.allaboutcookies.org/>; and
- Network Advertising Initiative: <http://www.networkadvertising.org/>.

Note that if you disable, delete, or refuse to accept cookies, you may not be able to use some features of the Site and/or some of our pages might not display properly.

## 10. What data is not covered by the privacy policy?

The limitations in and requirements of this Privacy Policy do not apply to:

- **Third Party Sites:** Any data you disclosed on Third Party Sites, even though we may provide links to them on the Site or in our emails. We are not responsible for the policies and practices employed by, or the content of, Third Party Sites. We suggest contacting those sites directly for information about their privacy policies and practices.
- **Non-Personally Identifiable Data:** Any non-personally identifiable data we collect, including, without limitation, Log Data, domain names of your Internet Service Provider, your approximate

geographic location, a record of your usage of the Site, the time of your usage, and aggregated Personal Data, but only to the extent the foregoing cannot be used to specifically identify you.

- **Aggregated Personal Data:** Any aggregated Personal Data that can no longer be used to identify you will be treated as non-personally identifiable data under this Privacy Policy.

## 11. Do you collect the personal data of children?

We do not intentionally or knowingly collect any Personal Data from children under the age of sixteen (16), nor do we target our emails to them. Children under the age of sixteen (16) should not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children's use of the Internet and instruct them to never provide Personal Data through the Site. If you believe a child under the age of sixteen (16) may have provided Personal Data to us through the Site, please contact us at [privacy@cmelitegroup.com](mailto:privacy@cmelitegroup.com) or use our form at <https://www.cmelitegroup.com/contact-us>, and we will use reasonable efforts to delete it from the Site and our files.

## 12. What if you change this privacy policy?

We may occasionally make changes to this Privacy Policy. If we wish to use your Personal Data for a new purpose not covered by this Privacy Policy, we will provide you with a new Privacy Policy explaining this new use prior to processing your Personal Data pursuant to the new Privacy Policy and setting out the relevant purposes and processing conditions. Whenever necessary, we will seek your prior consent to the new processing. If we change this Privacy Policy, your checking the box prompt before submitting Personal Data to us will signify your express consent to new uses of your Personal Data.

## 13. How can I resolve a privacy dispute with you?

Notwithstanding any dispute resolution provisions contained in our Terms and Conditions, any disputes over the use of this website and/or the user's personal data must be pursued through arbitration, the details of which are contained in the Terms of Use, which can be found here. If you have a complaint about this Privacy Policy or our privacy practices, we will work with you in an attempt to resolve your complaint under the arbitration procedures described in the Dispute Resolution section of the Site's Terms of Use.

To initiate an arbitration proceeding, you must send us a notice of your complaint that includes a written statement of your name, address, and contact information, the facts giving rise to your complaint, and the relief you are requesting (the "Dispute Notice"). The Dispute Notice must be addressed to: Capital Markets Elite Group, Albion Plaza, 22-24 Victoria Avenue, Queens Park Savannah, Port-of-Spain, Trinidad and Tobago, and sent to us by certified mail as described in the Dispute Resolution section of the Site's Terms of Use. If we do not reach an agreement to resolve your privacy complaint within sixty (60) days after we receive your Dispute Notice, you may commence an arbitration proceeding under the Dispute Resolution section of the Site's Terms of Use.

## 14. How can I contact you?

If you have any questions, have a complaint, a request or wish to send us comments about this Privacy Policy, visit us at <https://www.cmelitegroup.com/contact-us> or call or write to us. We will attend to your complaint and respond to you as quickly as possible. Our contact information is: Albion Plaza, 22-24 Victoria Avenue, Queens Park Savannah, Port-of-Spain, Trinidad and Tobago, Telephone: (833) 445-9086/(833) 445-9087, email: [privacy@cmelitegroup.com](mailto:privacy@cmelitegroup.com).