

## **Privacy Policy**

### **1. Introduction**

Nexify Capital Limited, trading as CTZ Markets (“we”, “us”, or “the Company”), respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how we collect, use, store, disclose, and protect personal data in accordance with the Seychelles Data Protection Act 2003 (as amended), applicable regulations, and guidance issued by the Seychelles Data Protection Commissioner and the Financial Services Authority (“FSA”).

We may update this Policy from time to time. Any changes will be published on our website, and continued use of our services constitutes acceptance of the updated Policy.

This Policy is governed by the laws of the Republic of Seychelles.

### **2. Data Controller**

Nexify Capital Limited is the data controller responsible for your personal data.

We have appointed a Data Protection Officer (DPO) responsible for overseeing compliance with data protection laws. You may contact the DPO at: [support@ctzmarkets.com](mailto:support@ctzmarkets.com)

### **3. Lawful Basis for Processing Personal Data**

We process personal data only where we have a lawful basis under Seychelles law, including:

- Performance of a contract (e.g. opening and operating trading accounts);
- Compliance with legal and regulatory obligations (including AML, KYC, and FSA requirements);
- Legitimate interests, where such interests are not overridden by your rights and freedoms;
- Consent, where required by law (including for marketing communications or sensitive personal data).

Where consent is relied upon, it is obtained through a clear affirmative action and may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.

#### **4. Categories and Sources of Personal Data**

We collect personal data directly from you and, where permitted by law, from third parties. This may include information obtained:

- In writing, electronically, or through online platforms;
- By telephone or in person;
- Through account applications, onboarding forms, or contractual documentation;
- From publicly available sources or regulatory databases.

Personal data may include, without limitation:

- Identification and contact details;
- Financial and transactional information;
- Trading and account activity;
- Device, IP address, and usage data;
- Information obtained from credit reference agencies or service providers.

#### **5. How We Use Personal Data**

We use personal data to:

- Provide and manage our services;
- Verify identity and comply with AML/KYC obligations;
- Execute and monitor transactions;
- Manage risk, compliance, and security;
- Communicate with customers;
- Improve our products and services;
- Comply with legal, regulatory, and reporting obligations.

#### **6. Disclosure of Personal Data**

We do not sell personal data. We may disclose personal data where necessary and lawful, including to:

- Banks, payment service providers, and liquidity providers;
- IT, data processing, and cloud service providers;
- Professional advisers, auditors, and legal counsel;
- Regulators, law enforcement, and government authorities;
- Group companies or affiliates where permitted by law.

Disclosures are limited to what is necessary for the recipient to perform their function.

## **7. Trade and Account Monitoring**

To comply with Seychelles law, including the Securities Act 2007 and related regulations, we monitor:

- Trading activity and transaction frequency;
- Deposits, withdrawals, and payment methods;
- Device information, IP addresses, and access logs.

Such monitoring is conducted strictly for regulatory, compliance, fraud prevention, and risk management purposes.

## **8. Cross-Border Data Transfers**

We may transfer personal data outside Seychelles where necessary to provide services or comply with legal obligations.

International transfers occur only where:

- The destination provides an adequate level of protection; or
- Appropriate safeguards are in place (such as contractual protections); or
- The transfer is necessary for contract performance, legal claims, or regulatory compliance; or
- You have provided explicit consent where required.

We take reasonable steps to ensure continued protection of personal data transferred internationally.

## **9. Data Breach Management**

We maintain incident response procedures to manage personal data breaches.

Where a breach is likely to result in a risk to individuals' rights and freedoms, we will:

- Notify the Seychelles Data Protection Commissioner without undue delay, and where required by law;
- Notify affected individuals where there is a high risk;
- Document the breach, its effects, and remedial actions taken.

## **10. Your Rights**

Subject to applicable law, you have the right to:

- Access your personal data;
- Request correction or updating of inaccurate data;
- Request deletion of personal data;
- Restrict or object to processing;
- Request data portability where applicable;
- Withdraw consent where processing is based on consent.

We will respond to requests within 30 days, unless an extension is permitted by law.

Identity verification may be required before processing requests.

## **11. Data Retention**

We retain personal data only for as long as necessary for:

- The purposes for which it was collected;
- Legal and regulatory obligations;
- Risk management, dispute resolution, and enforcement.

When data is no longer required, it is securely deleted or anonymized in accordance with Seychelles law.

## **12. Security of Personal Data**

We implement appropriate technical and organizational security measures to protect personal data, including:

- Access controls and encryption;
- Secure systems and monitoring;
- Employee confidentiality obligations and training;
- Physical and electronic safeguards.

Access to personal data is restricted to authorized personnel only.

## **13. Complaints and Contact**

For questions, data access requests, corrections, or complaints, please contact us at:

[support@ctzmarkets.com](mailto:support@ctzmarkets.com)

If you are not satisfied with our response, you may lodge a complaint with the Seychelles Data Protection Commissioner.

## **14. Governing Law and Jurisdiction**

This Privacy Policy is governed by the laws of the Republic of Seychelles. The courts of Seychelles shall have exclusive jurisdiction over any disputes arising from this Policy, without prejudice to your right to lodge data protection complaints with the Seychelles Data Protection Commissioner.