

## **FNK Technical Ltd Privacy Policy**

Read these Privacy Policy ("policy") carefully before using the services described herein by utilizing the website located at <https://fnk.com> ("website").

FNK Technical Ltd reserves the right to change, modify, add or remove portions of these policy at any time for any reason. FNK Technical Ltd may review and update this policy from time to time to take account of new laws, technology, changes to our operations, and the changing business environment. We suggest that you review this policy periodically for changes. such changes shall be effective immediately upon posting.

FNK Technical Ltd is committed to protecting the privacy of individuals and legal entities whose information is collected, and to assisting in resolving any issues that may arise in relation to this information. This policy describes how FNK Technical Ltd handles personal information collected.

This policy is written to explain to you "what" personal information we collect, "how" we process it, "where" it is stored, and how you can access or request removal of your personal information.

"FNK", "we" or "us" in this Privacy Policy refers to the FNK Technical Ltd (reg. 107146, incorporated in the Republic of the Marshall Islands) that controls the information that FNK collects when you use our services. This policy refers to our website <https://fnk.com>, domain and subdomains. Servicing is the process of performing the work of opening, maintaining, closing accounts and executing customer orders/requests under contracts entered into by FNK for customers.

In FNK we respect your privacy and therefore we are committed to protect your data, which we collect, use and/or have access to.

The Company takes measures to implement advanced data protection policies and procedures and to update them from time to time for the purpose of safeguarding its Client's data and the Client's account. Your data is protected by the legal, administrative and technical measures that we take to ensure the privacy, integrity and accessibility of data. To prevent security incidents with your data, we use a mixed organizational and technical approach based on the results of annual risk assessment.

The Company shall not divulge any private information of its Clients and former Clients unless the Client approves in writing such disclosure or unless such disclosure is required under applicable law or is required in order to verify the Client's identity or it is required for FNK to perform its contractual obligations under any agreement concluded with the Client. The Clients' information is processed only by the employees of the Company and/or employees of FNK and/or trusted third parties which provide specific support services, dealing with the specific Client's Accounts and necessary for the provision of our Services. All such information shall be stored on electronic and physical storage media according to applicable law.

FNK is required to collect and use certain types of information about individuals and entities wishing to participate in the FNK Platform operated by FNK Technical Ltd.

This Privacy Policy is written in accordance with the requirements of the laws of the Republic of the Marshall Islands and international law and defines the personal data processing procedures and measures to ensure the security of personal data.

Any data collected during the operation of the Platform, whether collected on paper, stored in a computer database or recorded on other materials, is subject to this policy and protected under applicable law.

Any user has the right to know who is responsible for processing his or her personal data.

## **Data controller/processor of personal data**

Name: FNK Technical Ltd

Registration code: 107146

Address: Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of the Marshall Islands  
MH 96960

Contact: Info@fnk.com.

## **General information.**

1. **Website** – <https://fnk.com>.
2. **Personal data** – any information related directly or indirectly to a specific or identifiable User of the website <https://fnk.com>.
3. **User** – any user of the website <https://fnk.com>.
4. **Provision of personal data** – actions aimed at disclosing personal data to a certain person or a certain circle of persons.
5. **Dissemination of personal data** – Any actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or familiarization of an unlimited circle of persons with personal data, including publication of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.
6. **Cross-border transfer of personal data** – transfer of personal data on the territory of a foreign state to a foreign authority, a foreign individual or a foreign legal entity.
7. **Personal data processing** – Any action (operation) or a set of actions (operations) performed with or without the use of automation with personal data, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, destruction of personal data.

## **Collected information.**

We may collect, use, store and transmit various types of data about you, which we have grouped together as follows:

- **Identification data** includes first name, last name and middle name (if any), date of birth gender, passport, ID card, driver's license number and a copy of a photograph.
- **Contact information** includes billing address, email address and telephone numbers.
- **Financial information** includes bank account and payment card information.
- **Transaction Data** includes information about the transactions you have made, payments, withdrawals, exchanges, trading history, profits, balance, how you deposited and withdrew amounts and any other information relating to the services you have used through our Website.
- **Technical data** includes your Internet Protocol (IP) address, your registration information, browser type and version, time zone settings and location, browser plug-in type and versions, operating system and platform, and other technology on the devices you use to access the Website and the use of cookies stored on your device.

- **Profile data** includes your Customer account information, username and password, transactions you have made, your interests, preferences, feedback and/or information from your interactions with us in the course of providing our services and responding to surveys.
- **Usage data** includes information about how you use the Website, products and services, registration date, account category, trading cluster, number of complaints, number of requests submitted and IP address history.
- **Marketing and communication data** includes your preferences for receiving marketing information from us and your communication preferences.
- **Special categories of data/"sensitive" data** include your religious beliefs and/or criminal convictions and offenses.
- **Eligibility data** includes your education, employment status, work experience in the trade, self-assessment test.
- **Banking data** includes the number of payment wallets and/or your bank card information, including the issuing bank, card number, cardholder name, card expiration date, payment system, card verification code (CVV2 / CVC2), and photos of both sides of the bank card.
- **KYC (Know Your Customer) data** includes identity document information, including copies of most recently dated utility bills, ID card, passport and/or driver's license.
- **Economic profile data** includes annual income, net income, estimated annual investment amount, sources of funds.
- **Location Data** includes information about your actual location when you interact with our Website (e.g. a set of settings that determine the regional settings for your interface, such as your country of residence, time zone and interface language).
- **Audio data** includes complete voice recordings of calls you receive from us or make to us (all of the above together referred to as Personal Information). And etc.

### **Goals of personal data processing.**

Purpose of processing the User's personal data – providing the User with access to the services, information and / or materials contained on the website <https://fnk.com>; clarification of transaction details.

If necessary for purposes that are in our or third parties' legitimate interests. These interests include:

- managing the site;
- Providing you with the services described on the site;
- verifying your identity when you log on to our site;
- Responding to customer service requests and assisting in resolving any disputes;
- providing you with up-to-the-minute news and information about our site and services, such as notifying you of changes to our services, site failures or security updates;
- Conducting technical analysis to identify ways to improve the website and the services we provide;
- monitoring activity on the site, for example, to identify potential fraudulent activity and to ensure compliance with the site's user terms and conditions;
- managing our relationship with you, for example, by responding to your comments or inquiries submitted to us on the site or by soliciting your feedback;
- managing our legal and operational affairs (including managing risks related to content and fraud issues);
- Training FNK staff on how to better serve our user community;

- improving our products and services; and
- providing general administrative and executive functions and activities.
- If you give us consent to provide you with marketing information about products and services that we think may be of interest to you.
- For statutory purposes.
- To respond to government, court, or law enforcement inquiries.

FNK has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending an email to the Operator at the email address [Info@fnk.com](mailto:Info@fnk.com).

Depersonalized User data collected through Internet services is used to collect information about User actions on the site, improve the quality of the site and content.

FNK processes the User's personal data only if they are filled in and sent by the User himself/herself through the special forms located on the website <https://fnk.com>. By filling out the appropriate forms and sending their personal data to FNK, the User agrees to this Policy.

### **How do we store and secure information?**

We take reasonable steps to protect all information we hold from misuse, tampering or loss, and from unauthorized access, alteration or disclosure. However, because data transmission over the Internet is not completely secure, we cannot guarantee the security of your data during transmission. All personal information stored electronically is stored on secure servers and protected by firewall security systems. As noted above, we may use a third-party cloud service provider to store our information. We may also store some personal information in paper form. This may be customer files, invoices, and business cards. Access to this information is restricted.

The security of personal data processed by FNK is ensured by implementing the legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation of Republic of Marshall Islands.

1. FNK ensures the security of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.
2. The site may contain links that direct you to other sites or services whose privacy practices may differ from ours. Your use and any information you provide on third party sites is governed by their privacy policies, not this policy. You should carefully review the privacy policies of such third parties.
3. If you discover inaccuracies in your personal information, you may update it yourself by sending a notice to FNK by email to [Info@fnk.com](mailto:Info@fnk.com).
4. The term of processing of personal data is unlimited. The User may withdraw its consent to the processing of personal data at any time by sending a notice to FNK by e-mail.

### **Cross-border transfer of personal data.**

Personal information may be disclosed to overseas recipients as part of the FNK service. The recipients could be located in any country and it is not practicable to specify those countries in this policy.

FNK is obliged, prior to the cross-border transfer of personal data, to ensure that the foreign country to which the transfer of personal data is intended to take place ensures the reliable protection of the rights of personal data subjects.

The cross-border transfer of personal data to foreign countries that do not meet the aforementioned requirements may take place only with the written consent of the personal data subject for the cross-border transfer of his/her personal data and/or performance of the contract to which the personal data subject is a party.

### **Your rights**

You have various rights regarding your personal information, and we respect those rights. Regarding marketing emails, you can ask us not to send them to you at any time - just follow the "update your preferences" or "unsubscribe from this list" options at the end of the marketing email.

You also have the right to

- to unsubscribe from any promotional materials we may send from time to time via email, SMS, mail, phone, or any other method. You will also receive general notifications about account activity. If you also want to stop receiving such correspondence, we ask that you close your FNK account.

- Right to Delete - You have the right to request the deletion of your personal data. You will be able to request deletion of all relevant Personal Data and Financial Data from the section in your account.

- Right to Correction - You have the right to request correction of any incorrect Personal Data we keep about you if that information is inaccurate or incomplete. If you are unable to make the necessary corrections from your account, please contact us.

- Right to Data Portability - You have the right to request a machine-readable export of all personal data we keep about you. It will be delivered as a ZIP file containing multiple CSV files.

- Right to object - Under certain circumstances, you may object to us processing your personal data. If you wish to file an objection, please contact us.

- Right to Restrict Processing - You may request that we restrict the processing of personal data we hold about you under certain circumstances. If you wish to make such a request, please contact us.

### **Cookies**

Our website may use cookies. Cookies are small text files that are stored on your computer when you visit certain websites. We may use cookies to identify your computer so that we can track the contents of your shopping cart and remember where you are in the checkout process. You can disable any cookies that are already stored on your computer, but doing so may prevent our website from functioning properly. When you browse our site, our web server may record the following information for statistical and analytical purposes and to improve our site:

- your server address
- Your top-level domain (for example, .com, .gov, .net, etc.)
- The pages you have visited and documents you have downloaded
- The previous Web site you visited
- What type of web browser you're using.

However, this information is anonymous.

FNK will track the pages you visit using Google Analytics. This information is transmitted to Google Analytics when you visit our site and may be stored abroad in several countries.

## **Data ownership**

You are the owner of all data that you enter into FNK. More specifically, we recognize the individual or entity that controls access to the email provided as part of your login credentials as the owner of the account and the data contained therein.

In cases where a dispute arises between employees of your organization or a third party, we will play no role in resolving such disputes and will recognize the email owner as the owner of the account.

In the event of a dispute over account ownership, we ask that you resolve it by taking control of your FNK login email address through your hosting company or IT service provider. Once you have relinquished control of your login email address, you can initiate a password reset to regain access to your account.

## **Accessing your personal information, other requests or complaints**

If you would like access to the personal information we hold about you, or believe that your personal information is inaccurate and needs to be corrected, please contact us. We will take reasonable steps to keep your personal information accurate, complete and current. If you have a complaint regarding your privacy, please contact us in writing. Any complaint will be investigated by our Privacy Officer and resolved within a reasonable time.

User can get any clarifications on the issues of interest related to the processing of his personal data by contacting FNK via e-mail [Info@fnk.com](mailto:Info@fnk.com).

The current version of the Policy is freely available on <https://fnk.com>.

**FNK Technical Ltd reg. code: 107146, Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of the Marshall Islands MH 96960**