

**JUST GLOBAL MARKETS (VG)
LIMITED
PRIVACY AND COOKIES POLICY**

1. ABOUT US

Just Global Markets (VG) Limited, having its address at Trinity Chambers, PO Box 4301, Road Town, Tortola, VG1110, British Virgin Islands, a company regulated by the British Virgin Islands Financial Services Commission ("FSC") under Investment Business License number SIBA/L/24/1177 (hereinafter referred to as the "Company").

2. PURPOSE

This Policy governs the usage of all online platforms, including websites, client portals, mobile and desktop applications, marketing pages, and any other digital services provided by the Company (collectively referred to as the "Services"). It outlines:

- The types of personal data we collect;
- The reasons for collecting it and the legal grounds we rely on;
- Who we share this information with;
- How long we retain it and the measures we take to secure it;
- Your rights regarding your data; and
- Our use of cookies and similar tracking technologies.

3. TYPES OF DATA WE COLLECT

We may gather, store, and share various categories of personal data related to you, including (but not limited to) the following:

- Personal Identification Information: Full name, chosen username or unique handle, title, date and place of birth, gender, nationality, and country of habitual residence.
- Contact Information: Home or billing address, shipping address, email, and phone numbers provided by you.
- Verification (KYC) Details: Information from or linked to passports, national IDs, driver's licenses; proof-of-address documents like utility bills; evidence of source of funds (e.g., payslips or tax returns); as well as results from credit, sanctions, or watch-list checks.

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- Financial Profile: Data regarding assets, income, financial status, wealth origin, employment details, job title, industry, and identifiers for bank accounts, e-wallets, and card numbers (partially redacted).
- Education & Employment History: Academic qualifications, professional certifications, job titles, current employers, and nationality-related information.
- Contractual Information: Records relating to the products or services requested or provided by the Company.
- Trading Information: Purpose for opening an account, previous trading experience, risk tolerance, as well as your trading history, open and closed positions.
- Payment & Transaction Details: Information on incoming and outgoing payments, funding and withdrawal methods, transaction objectives and amounts, and related goods or services purchased.
- Government Identification: Tax ID numbers, tax residency details, and other official identifiers.
- Consent & Preferences: Logs of marketing consent, cookie preferences, and other consents you have provided to the Company.
- Technical Information: IP addresses, login timestamps, browser types, timezone and locale data, plugin versions, operating system and platform details, as well as device identifiers used to access our sites, apps, or digital tools.
- Communication Records: Correspondence, emails, chat logs, and phone recordings, including your preferences regarding marketing messages.
- Usage Data: Analytics on how you interact with our websites, apps, and services, including browsing patterns and feature engagement.

4. TYPES OF DATA WE COLLECT

We process the personal data outlined above to manage our operations, provide the products and services you request, and fulfill our regulatory obligations. Specifically, we use your data to:

- Account Management: To create and maintain your account, verify the accuracy of the information you provide, conduct identity and "know-your-customer" (KYC) checks, and establish secure login credentials.

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- **Trading & Payment Services:** Your data is essential for enabling you to deposit or withdraw funds from your account, execute and settle trades, generate financial statements, and provide continuous customer support.
- **Risk Monitoring & Legal Compliance:** We monitor transactions and account activities to detect fraud, money laundering, sanctions violations, and other unlawful behavior. We also prepare regulatory reports as required by local authorities.
- **Enhancement & Personalization:** Usage data, crash logs, and feedback help us troubleshoot technical issues, develop new features, customize the platform to your preferences, and ensure that the website, apps, and interfaces operate smoothly.
- **Communication & Updates:** We may send notifications regarding our services, product updates, security alerts, and responses to your inquiries. Additionally, we may send market insights and educational content if you have opted to receive them.
- **Marketing & Promotions:** With your consent, we use your contact details, preferences, and certain cookies or mobile identifiers to send targeted offers, newsletters, and advertisements that may be of interest to you. You can opt out of marketing communications at any time.
- **Protection of Legal Rights:** We store and analyze data to enforce our terms and policies, recover debts, resolve disputes, defend against claims, and cooperate with legitimate requests from courts and regulators.

We do not sell your personal data. When sharing data with trusted third-party service providers—such as KYC vendors, payment processors, cloud service providers, or analytics platforms—we do so under strict confidentiality agreements and security measures, ensuring that the data is used solely for the purposes described above.

5. DATA PROTECTION MEASURES

The Company employs advanced technologies to safeguard personal data. We have implemented robust security measures to prevent the accidental loss, misuse, unauthorized access, alteration, or disclosure of personal information. Our employees adhere to strict protocols when transferring information within the Company.

Access to personal data is strictly limited to employees who need it for specific tasks, with only certain roles (e.g., verification officers or account managers) granted full access to client data.

All information and access are encrypted using SSL technology. If the Company has provided a password to the Client (or if the Client has selected one) to access certain areas of the website, the Client is responsible for maintaining the confidentiality of that password. The Company will never ask the Client to share their password with anyone.

We are committed to implementing reasonable and appropriate organizational, physical, and technical measures to protect your personal data. In the event of a data breach involving unauthorized disclosure of your personal information, the Company will notify you and report the incident to the relevant Regulatory Authority.

6. DATA RETENTION

Personal data will be retained for a period of 5 years. Once this period has elapsed, the Company reserves the right to delete all client data if it determines that the personal information is no longer required for the purpose it was originally collected.

However, the Company may retain personal data for longer than 5 years if required for legal, regulatory, or technical purposes.

7. SHARING OF INFORMATION WITH THIRD PARTIES

We may share your personal data with other entities within the group, as well as with third-party service providers involved in delivering products or services to you. This includes, for example, authentication and payment processors. Additionally, we may disclose information to third parties supporting our business operations, such as outsourced compliance services, website hosting, analytics providers, and banking partners.

In some cases, we or these third parties may share personal data with external auditors for auditing purposes, or with professional advisors, such as lawyers or consultants. In all such instances, recipients are bound by strict confidentiality agreements.

We only share information as necessary to fulfill our legal obligations, ensuring that confidentiality and security are maintained when transferring your data to third parties.

The Company may disclose personal data to third parties under certain circumstances, including:

- To protect personal rights and property in legal proceedings;
- To comply with court orders;
- To provide information to law enforcement authorities upon official request;
- To share information with business partners (trustees) in order to improve the quality of services.

In some cases, full personal data may be shared with third parties to enhance the quality of services provided.

At the Client's request, the Company can provide details about the services offered by its partners.

We closely monitor the data usage by agents and third parties to ensure compliance with our confidentiality and data protection policies, preventing any misuse of information. The Company retains full access to all data processed by these agents or third parties at all times.

8. USE OF COOKIES AND SIMILAR TECHNOLOGIES

The Company uses cookies, software development kits (SDKs), pixel tags, local storage objects, and similar tracking technologies (collectively referred to as "Cookies").

We place first-party Cookies directly and allow selected third-party partners to place cookies on our Site, always in line with your preferences set in our Cookie Preference Centre or within your browser settings.

Cookies are small text files that a website stores on your computer or mobile device to recognize that device on future visits. They capture data such as the pages you've visited, language preferences, visit duration, and interaction with advertisements. First-party cookies are set by the Company, while third-party cookies are set by external service providers, such as analytics or advertising networks.

Cookies help us to:

- Safely route traffic, authenticate sessions, and prevent fraudulent activity;
- Remember your preferences (e.g., interface language);
- Analyze Site usage to improve content and performance;
- Personalize content and advertising to better suit your needs;
- Measure the effectiveness of our marketing efforts.

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We employ various tracking technologies, including cookies, SDKs, pixel tags, and local-storage objects, to identify your browser or device, maintain sessions, enhance security, conduct analytics, and deliver personalized content. These cookies are simple text files or code snippets and cannot run programs or deliver malware.

Categories of Cookies we use:

Strictly Necessary	Operate the Site, enable login, set privacy preferences, and prevent fraud
Performance / Analytics	Count visits, diagnose errors, and understand navigation patterns
Functionality	Remember choices such as language or region enable enhanced features
Targeting / Advertising	Build interest profiles, limit ad frequency, and gauge campaigns

We do not retain Cookies for longer than necessary. Their lifespan ranges from the duration of the current session to up to 12 months, after which they are either deleted or renewed only with your active consent.

For instructions on how to adjust or remove cookies in your browser, please refer to the independent guide available at aboutcookies.org.

Trusted processors, including Google, Meta, Microsoft Advertising, and X (formerly Twitter), may place Cookies for analytics, fraud prevention, and advertising purposes on our behalf. Each of these processors is bound by a data processing agreement and must apply security safeguards equivalent to those employed by the Company.

By continuing to use or browse the Site without modifying your browser or Cookie settings, you are deemed to consent to our placement and use of Cookies as described in this Policy.

9. USE OF COOKIES AND SIMILAR TECHNOLOGIES

To operate, secure, and continuously enhance the User Experience, we collaborate with a select group of trusted third-party service providers ("Service Providers").

In cases where these integrations involve transferring data outside your country of residence, we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses or other recognized transfer mechanisms. By using the App, you acknowledge that your information may be processed by the listed Service Providers, and we encourage you to review their respective privacy policies to understand how they handle your data.

Service Provider	Main Purpose(s)
Google Privacy Policy	Core mobile device functionality, in-app billing, push notifications
Google Analytics for Firebase	Aggregated usage analytics, event tracking
Firebase Crashlytics	Real-time event reporting and diagnostics
Facebook	Social login, advertising attribution, behavioural analytics
Amplitude	Product analytics, funnel analysis, and retention metrics
AppsFlyer	Install attribution, cohort analysis, and fraud detection
Trustpilot	Collection, display, and verification of user reviews regarding our services and products

10. UPDATING YOUR PERSONAL INFORMATION

The Company assumes that all personal data provided is accurate and up-to-date. Therefore, we ask that Clients notify us of any changes to their personal information through the appropriate forms in the Personal Area.

11. YOUR DATA RIGHTS

As a data subject, you have the following rights regarding your personal information:

- Access & Copy: Request access to and a copy of your personal data;
- Rectification: Correct any inaccurate or incomplete data;
- Erasure ("Right to be Forgotten"): Request the deletion of your data, where legally possible;
- Restriction or Objection: Restrict or object to the processing of your data in specific situations;
- Data Portability: Request your personal data in a structured, commonly used format for transfer to another entity;
- Withdrawal of Consent: Withdraw consent for processing, especially for marketing purposes or non-essential cookies.

If you wish to stop us from using your personal data, please notify the Company by sending an email to support@justmarkets.com. Please note that if you make this decision, the Company will no longer be able to provide the services and information requested.

12. CHANGES TO THIS POLICY

The Company reserves the right to update this Policy periodically to reflect new services, legal requirements, and technological advancements, as well as any changes in our business operations or applicable legislation. In the event of any updates to this Policy, we will post the changes on our website and notify Clients via email or through the Company's website.