

# PRIVACY POLICY



## 1. Information and Records

**1.1.** This Privacy Policy describes how Uptos obtains, uses, and discloses information on our website, mobile applications, platforms, and other services. We collect and keep a record of your information that you provide us directly, including, without limitation, when you:

- Register an account with Uptos;
- Fill out a form;
- Participate in our interactive features such as contests and promotions;
- Conduct an attempted or successful financial transaction;
- Avail or purchase any of our services or products;
- Connect with us through our available means of communication such as phone calls, emails, live chat, and social media platforms.

**1.2.** The basic information we may collect from you include your full name, email, and contact number, which we may use to create, maintain, and identify your account. We may also use your contact information to provide you with our offered services. You agree that additional information and documentation are required to complete your profile and account verification. This includes, without limitation, your:

- Date of birth;
- Complete address and residency information;
- Nationality and citizenship information;
- Employment information such as occupation, source of income, etc.; and
- Financial capabilities.

**1.3.** For us to provide you the appropriate services and trading portfolio, you agree to disclose your investing experience and financial information such as your financial objectives, investment portfolio, source of investments, and other information as may be required to complete your portfolio. For further identification, we may require you to provide copies of identification documents such as:

- Passport and other identification cards and documents, including license and national I.D.;
- Proof of residency, including utility bill and bank statement; and
- Copies of the cards used to fund your account with Uptos.

## 2. Use of Information

**2.1.** We only use the foregoing information and documentations to:

- Conduct identity verification procedures as required by the anti-money laundering (AML) law and know-your-customer (KYC) policy;
- Reference in case of complaints and disputes resolution;
- Verify that you are not associated with any financial fraud activities;
- Verify that you are not a politician or a politically involved person;
- Contact you regarding your account, including requests for additional information or documentation;
- Inform you about your account status;
- Provide you update in connection with your trading account, including market updates;
- Align our offered services and products in connection with assessing your credit risk; and
- Set up security measures to secure your trading account (two-factor authentication).

**2.2.** We do not disclose any collected information and records, except for business purposes among Uptos, our affiliates such as subsidiaries, service providers, and other affiliated financial institutions.

**2.3.** In spite of our best efforts to keep your information and documentation secure, we cannot and do not guarantee that all such information will be private at all times. We are not liable for any unauthorized access that may use our data for any unfavorable activities.

## 3. Use of Cookies and the Website

**3.1.** You accept that we may automatically collect your log information including the pages you visit and the time of your visit, your IP address, and other network identifiers, and the referral page prior to your access to our website. We may also collect the information of your device such as the type of browser and device that you use, including the version and mobile network identification. Your used device might also ask permission to enable your location settings.

**3.2.** You acknowledge that our website uses “Cookies” that automatically obtains data information to help us improve our services and your use and experience. The use of “Cookies” can also help the effectiveness of our campaigns and to see which areas and features of our website and services have the most count visits, including which ones are used best.

**3.3.** All information collected will be used to help us monitor the activities, including potential abuse of our services and identification of illegal activities. You agree that the information we collect from you can also be used as admissible proofs for investigations and legal proceedings in compliance with relevant court orders.

## 4. Social Trading Features

**4.1.** You acknowledge that if you have used one of our applications provided through third-party platforms such as social media networks and websites, our application may access your social network account and its general information. This

may include your name, username, display photo, gender, networks, user ID, list of friends, and other information as authorized to be accessed according to your network settings. You accept that access some featured access, including data collection and, may be beyond our control and is as part of the privacy policy of such network.

**4.2.** Further to the services we provide, Clients can access our real-time social trading platform that integrates rich community and social features into the trading platform. Using our Services constitute your agreement and acknowledgement that your general information shall be considered non-confidential and non-proprietary information.

**4.3.** As part of our traders' network, Clients who opt to be a part of the community can share their strategies and performance with other Clients. The amount being traded is never disclosed and all participants are required to agree to be a part of the network and share their strategies and performance.

**4.4.** If the Client uses any information provided in the social trading features to his/her trades or investments, he/she is solely responsible for the outcome, regardless if such outcome is to his/her advantage or disadvantage.