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PRIVACY POLICY AND COOKIES

We strongly advise you to thoroughly review this policy before accessing the Website or utilizing any of the company's Services.

PREAMBLE

1. This Privacy Policy and Cookies (hereinafter referred to as "Policy") outlines the procedures and steps DIGITAL TRADING GROUP OF CENTRAL AMERICA, S.A. DE C.V. (hereinafter referred to as "DTGoCA," "Company," "we," "us," or "our," as applicable), with its registered office at Av La Revolucion #Nivel 6 Apto. Local 12, San Benito, Presidente Plaza, Distrito San Salvador, Municipio De San Salvador Centro, Departamento De San Salvador, El Salvador, follows to uphold the utmost standards of confidentiality and safeguard the privacy of its Clients, related individuals, and other persons whose personal data it collects and processes. This commitment includes providing clear and open communication regarding the scope and nature of such data processing, as well as informing you of any rights you may have in connection therewith.
2. This Policy sets forth the manner in which we collect, use, disclose, and safeguard personal information pertaining to: (i) individuals who apply for or utilize our products and Services, (ii) former clients who have concluded their contractual relationship with the Company, (iii) visitors to our Website, and (iv) Trusted Contact Persons. Further, this Policy outlines the type of information collected through cookies, the manner in which it is utilized, and the

rationale behind retaining such data. Additionally, we will provide guidance on how you may opt to disable cookie storage, although doing so may impair or disable certain functions of the Website.

3. The scope of this Policy extends to the website www.dtg-ca.com, including all related sub-domains, as well as any mobile applications that we own and manage.
4. If you do not consent to the use of your personal data as outlined in this Policy, you should refrain from accessing or using the Website, as well as from utilizing any Services we provide, or you should revoke your consent. Any capitalized terms not defined in this Policy shall carry the meanings assigned to them in the Terms and Conditions.
5. This Website and the Services we offer are not intended for individuals under the age of 18, and we do not knowingly gather personal data from anyone under 18 years of age. In the event that we become aware that personal data from a person under the age of 18 has been submitted to us through this Website or by any other means, we will take appropriate measures to remove such data. If you suspect that we may have inadvertently received personal data from a minor under 18, please notify us promptly.

COLLECTION OF PERSONAL DATA

WHAT ARE PERSONAL DATA

For the purposes of this Policy, "Personal Data" refers to any information that, whether on its own or combined with other details, allows for your direct or indirect identification. Examples include, but are not limited to, your name, email address, username, contact information, or any distinctive identifier such as an IP address, device ID, or other digital identifiers.

WHAT PERSONAL DATA WE COLLECT

1. The specific types of Personal Data collected will vary based on the actions you undertake via our Website and Trading Platform. Please be aware that certain Personal Data is necessary for the formation of a contractual relationship with the Company. Individuals who choose not to supply this data will be unable to open an Account or access the Company's products and/or Services.
2. We may gather, process, store, and share various categories of your Personal Data, which we have classified as follows:
 - Identification Information includes, but is not limited to, first name, maiden name, surname, username or similar identifier, marital status, honorifics, nationality, date of birth, and gender;
 - Contact Information comprises billing address, email address, phone numbers, cryptocurrency wallet addresses;
 - Financial Information includes details of bank accounts and payment card information, estimated annual earnings and net worth, source of income, profession, employer details, job title, investment holdings, liquid assets, and any other relevant financial details;
 - Transaction Information encompasses specifics of transactions, including the date, value, and currency of deposits, withdrawals, or transactions, payment methods, and descriptions of any products or services you have acquired from us;
 - Technical Information covers internet protocol (IP) addresses, login data, browser type and version, time zone settings, location, browser add-ons, operating systems, platforms, and other technological data related to the devices you use to access the Website and/or Trading Platform;

- Profile Information includes usernames, passwords, preferences, feedback, and responses to surveys;
 - Usage Information refers to data on how you interact with our Website, products, and services, including page activity (such as scrolling, clicks, and mouse movements), methods of navigation away from the Website;
 - Marketing and Communication Preferences include your choices concerning receiving communications and marketing materials from us and third parties, as well as your communication preferences;
 - Verification Documents encompass information contained in documents provided for identity verification purposes, such as passports, utility bills, bank statements, or company registration documents;
 - Trusted Contact Person Data includes the name, surname, phone number, relationship to the Client who authorized you, and your address.
3. Please be aware that all telephone conversations and other communications with us may be recorded and retained for our business purposes, including dispute resolution or in connection with legal proceedings.

HOW WE COLECT PERSONA DATA

1. Personal data may be obtained:
 - From you:
 - a) directly from you, such as when you register an Account or engage with our Services and communicate with us,
 - b) indirectly, such as through your browsing activity on our Website (see Cookies section below).
 - From external sources:

Additionally, we may acquire Personal Data about you from external sources, including third parties assisting us with updating, expanding, and analyzing our records; detecting and preventing fraud; processing payments; or evaluating your use of our Services.

- From public sources:

We also lawfully obtain and process Personal Data from publicly accessible sources (including, but not limited to, the media, social networks, and the internet). Furthermore, our Services may feature embedded content or links to material provided by third parties (e.g., live chat functions, social media content, plug-ins, and applications).

PURPOSES OF DATA COLLECTION

We process your Personal Data for one or more of the following reasons:

- To manage your Account with us;
- To enhance the security of our information systems and networks;
- To verify your identity and perform necessary credit assessments;
- To understand your needs and determine your eligibility for certain products or Services;
- To assess, establish, and maintain the contractual relationship between you and the Company, and to deliver products and Services to you;
- To provide you with transaction-related services;
- To comply with applicable data protection regulations and other legal obligations, including court orders, tax laws, reporting requirements, and anti-money laundering measures;
- To protect clients from financial abuse in cases involving a Trusted Contact Person;

- To facilitate transactions, such as deposits, chargebacks, and payments, and to monitor trading activity for any irregularities or potential illegal activities;
- To process billing and collect fees;
- To inform you about updates and new products, including any changes or improvements to the Website;
- To keep you informed about matters relevant to your business relationship with us;
- To use your pseudonymized data to display advertisements for our products and services on social media platforms such as Facebook, Twitter, LinkedIn, YouTube, Google, or through third-party advertisements on other websites;
- To enhance the Website's content and user experience, customizing it for individual users, and to provide, maintain, and improve its features and Services;
- To identify, prevent, and investigate fraud, unauthorized transactions, and other illegal activities, and to manage risk exposure;
- To manage our business operations and ensure compliance with internal policies and procedures;
- To defend, investigate, or pursue legal claims;
- To review, investigate, and respond to any inquiries or feedback you may provide;
- To obtain professional advice;
- To use your pseudonymized data to display advertisements for our products and Services on social media platforms such as Facebook, Twitter, LinkedIn, YouTube, Google, or through third-party advertisements on other websites;
- To better understand your preferences and interests so that we can contact you with information and marketing communications that are more relevant to you;
- For statistical analysis aimed at improving our future products and services. Such data is anonymized and aggregated to prevent identification. We may share these statistics with third parties solely for the purpose of improving marketing strategies;
- Your email address may be used for communications related to our products and Services, including marketing campaigns.

DATA RETENTION PERIODS

We retain your Personal Data for as long as your account remains active, or as long as necessary to fulfill the purposes for which the Personal Data was initially collected. This may also include retention for other valid business reasons, such as complying with legal, regulatory, or compliance requirements. The duration for which Personal Data is held may vary depending on the specific purposes for which it was collected and the requirements of relevant laws or regulations. Once the Personal Data is no longer required, we will either anonymize it by removing identifiable information or securely dispose of it. However, certain information may be retained for an extended period to meet legal retention requirements, such as those related to tax obligations, fraud prevention, and anti-money laundering laws.

EXTERNAL WEBSITES

The Website may contain links to external sites or social media platforms. Please note that once you navigate away from the Company's Website, the Company has no control over those external sites. Therefore, the Company cannot be held responsible for the protection and privacy of any information you provide while visiting such sites, as they are not governed by this Policy. Please review the privacy policies and terms of use of those third-party sites to understand their practices.

The Company will not be liable for any unauthorized or unlawful use of your Personal Data resulting from the misuse, negligence, or misplacement of your password, whether by you or a third party.

RIGHTS CONCERNING PERSONAL DATA

1. You may have certain rights under Applicable law regarding the processing of your Personal Data. It is important to note that these rights may not apply in every situation. You are entitled to request access to some or all of the Personal Data we have collected and stored about you at the time of your request, or to have any inaccuracies corrected. If you believe that your Personal Data is incorrect, incomplete, or outdated, you may request a correction at any time. Unless we hold your Personal Data as part of a third-party administrative record-keeping function, we will amend or update it upon verifying that the information is inaccurate or incomplete. To exercise these rights, please contact us using the details provided below.
2. For individuals who are currently residents of the European Union, you may have the following rights: (1) to inquire about the Personal Data we hold about you, its usage, and to request a copy of it; (2) to correct any inaccurate or incomplete Personal Data; (3) to request erasure of your data, subject to our legal obligations; (4) to request restrictions on processing under certain circumstances; (5) to withdraw consent where processing is based on consent; (6) to object to certain processing activities, including for direct marketing purposes; (7) to request the transfer of your Personal Data; (8) to file a complaint with a data protection authority; and (9) to exercise rights related to automated decision-making and profiling. These rights may be subject to limitations, and in certain situations, we may not be able or required to fully comply with your request, or we may only be able to fulfill it in part. Additionally, we may not provide access to information that affects the privacy rights of other individuals unless we obtain their consent.
3. We aim to respond to all requests within 30 business days, but in complex cases or when multiple requests are made, we may require additional time. All requests should be directed to legal@dtg-ca.com, and the request must come from an email address that is registered with us. We may ask for further confirmation before proceeding with any request.
4. If a request is manifestly unfounded, excessive, or repetitive, or if you request additional copies of the same data, we may charge a reasonable fee. In such cases, we will notify you of the fee, which must be accepted before we process your request. Alternatively, we reserve the right to decline requests under these conditions.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

1. The personal information you provide to us, or that is provided by the Client in the case of a Trusted Contact Person, will not be shared with any third party without your explicit consent, except in the following situations:
 - When required by law, including to regulatory bodies, law enforcement agencies, or other governmental authorities;
 - To assist in crime prevention, ensure legal compliance, or screen and compare data against sanctions and crime prevention databases;
 - To disclose information to our related entities, including current and future parent companies, affiliates, subsidiaries, or other entities under common ownership and control;

- When the information has been made public by you or otherwise becomes publicly known without any action or omission by us;
 - To professional advisors, service providers, consultants, payment processors, IT hosting companies, banks, cryptocurrency exchanges, other financial institutions, and credit reporting agencies who require access to your Personal Data to perform services on our behalf;
 - To other companies assisting with internal operations, such as account management, order fulfillment, customer service, satisfaction surveys, or other business-related data collection;
 - If you were introduced to us through a business intermediary, we may share certain details of your dealings with us with that intermediary;
 - During the course of negotiations, or in connection with, any merger, sale of company assets, financing, or acquisition of all or part of our company by another entity;
 - If we believe that your actions violate our terms and conditions, or to protect the rights, property, and safety of our company or others;
 - To select third-party marketing automation providers for marketing activities or to third parties conducting verification processes on our behalf.
2. The use of any shared Personal Data is strictly limited to the specific task we have requested. Third parties with whom we share data are obligated to protect Personal Data with the same level of care and security as we do.

DATA SECURITY MEASURES

1. We ensure that your Personal Data is stored and protected in compliance with relevant data protection laws applicable in our jurisdiction. We implement robust administrative, physical, and technical measures to secure the confidentiality, integrity, and availability of your Personal Data. Access to your Personal Data is restricted to individuals with a legitimate business need, and those handling your Personal Data are bound by confidentiality obligations.
2. We employ Secure Socket Layer (SSL) technology to safeguard the Personal Data you submit to us. Your Account details are stored in a secure area of our website, shielded by firewalls and other protective measures against unauthorized external access. If you are provided with or select a password to access certain sections of our Website or Trading Platform, you are responsible for maintaining the confidentiality of this password and are advised not to disclose it to others.
3. While we adhere to industry-standard security practices, you acknowledge that the nature of internet transmissions inherently involves risks. This includes potential exposure to unauthorized software, electronic intrusions, and issues with data transmission and reception. Consequently, we disclaim liability for any breaches of confidentiality or unauthorized access resulting from such risks.
4. Furthermore, your Personal Data may be transferred to or accessed from jurisdictions that may not offer the same level of Data Protection as your home country. Our Services cater to users globally. For users in the European Economic Area (EEA), any Personal Data collected may be transferred to and stored in locations outside the EEA, which may not provide equivalent data protection standards. In such cases, we have implemented appropriate

safeguards to protect your Personal Data and ensure that you have recourse in the event of misuse.

OTHER PROVISIONS

1. We may use your Personal Data to offer you products and services that we believe may interest you. We will not do this if you tell us not to. If you do not wish to receive marketing offers from us, please send an email to us at support@dtg-ca.com
2. We may ask for further information to confirm your identity before permitting you to exercise certain rights as specified above.
3. You agree to update information and Personal Data you provided to us upon our request, if we consider the information and Personal Data provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and Personal Data and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our services to your profile based on such information and Personal Data.
4. We reserve the right to alter, revise or update this Policy or any part of it at any time without prior notice. All changes will take effect immediately upon being posted on the Website. The most recent version of the Policy will govern the processing of your Personal Data and will be accessible at www.dtg-ca.com. Your continued use of our Website and Trading Platform following the effective date of any changes constitutes your acceptance of those revisions. It is your responsibility to regularly review the Policy and any updates. In the event we make a material change to this Policy, as determined at our sole discretion, we may notify you via email to the address linked to your Account. Where required by law, we will seek your consent or to re-confirm your acceptance or provide you with the opportunity to opt out of any new uses of your Personal Data. Such acceptance or consent may be necessary for continued access to and use of the Trading Platform, Account and/or Services.
5. If you do not agree to any of the changes made to this Policy, you must stop using the Website, Trading Platform, Account and the Services immediately and notify the Company in writing without delay. You acknowledge and accept that your sole and exclusive remedy in such a situation is to discontinue the use of the Services and close the Account. You further agree that the Company shall not be responsible for any losses or damages incurred by the Client or any third party due to any modifications or amendments to the Policy.

COOKIES

WHAT ARE COOKIES

In alignment with standard practices observed by most professional websites, this Website employs the use of cookies—small data files that are stored on your device—to enhance user experience.

HOW WE USE COOKIES

Cookies are utilized for several purposes, as explained below. Regrettably, there are typically no universally accepted methods for deactivating cookies without adversely affecting the functionality and capabilities they bring to this Website. Therefore, it is advisable to keep all cookies enabled unless you are certain they are unnecessary, as they may be essential for certain services you rely on.

DISABLING COOKIES

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this Website. Therefore it is recommended that you do not disable cookies. This Cookies Policy was created with the help of the <https://www.cookiepolicygenerator.com/cookie-policy-generator/>

THE COOKIES WE SET

- **Account related cookies** Should you choose to register an Account with our Trading platform, cookies will be employed to facilitate the Account creation process and support administrative functions. Typically, these cookies are removed upon logging out. However, in certain instances, they may persist to retain your preferences for future visits, even when you are no longer signed in.
- **Login related cookies** Cookies are employed during your login sessions to retain your authentication status, ensuring that you do not need to re-enter your credentials each time you navigate to a different page. These cookies are generally cleared or deleted upon logging out, ensuring that restricted sections and features remain accessible only while you are actively signed in.
- **Email newsletters related cookies** This Website provides newsletter or email subscription services, and cookies may be utilized to track your subscription status. These cookies help determine whether you are already registered and whether specific notifications, applicable only to subscribed or unsubscribed users, should be displayed.
- **Orders processing related cookies** This Website features e-commerce and payment services, and certain cookies are vital to ensure that your order details are retained across different pages, allowing us to process transactions accurately.
- **Surveys related cookies** Periodically, we conduct surveys or questionnaires designed to offer valuable insights, useful tools, or gather more precise information about our user base. These surveys may utilize cookies to identify participants or to maintain accurate results when navigating between pages.
- **Forms related cookies** When submitting information via forms, such as those on contact or comment pages, cookies may be employed to store your user data for ease of future communication.
- **Site preferences cookies** To provide you with an optimal experience on our Website, we offer you the ability to customize your preferences regarding how the Website operates during your visits. In order to store and recall these preferences, it is necessary for us to utilize cookies. These cookies enable the retrieval of your preference information each time you access a page that is impacted by your settings.

THIRD PARTY COOKIES

In certain circumstances, we also utilize cookies supplied by reputable third parties. The following section outlines the third-party cookies you may encounter on this website:

- **Google Analytics:** This Website uses Google Analytics, a widely trusted analytics service, to help us better understand how visitors interact with the Website and identify areas for improvement. These cookies may collect Personal Data such as the duration of your visit and

the pages you access, enabling us to create more engaging content. For additional details about Google Analytics cookies, please refer to the official Google Analytics website.

- **Third-Party Analytics:** We employ third-party analytics services to monitor and analyze Website usage, assisting us in enhancing your experience. These cookies may record information such as the time spent on the Website and the pages visited, providing insights into areas where improvements can be made.
- **Feature Testing Cookies:** Periodically, we introduce new features or make incremental adjustments to the Website's functionality. During testing phases, cookies may be used to ensure a consistent user experience while allowing us to identify which optimizations users find most valuable.
- **E-commerce Analytics:** Since we offer products for sale, it is crucial to track metrics related to purchases made by site visitors. These cookies gather data on conversion rates, helping us make accurate business forecasts and manage advertising and product pricing strategies to provide you with competitive rates.
- **Google AdSense:** The advertising service, Google AdSense, which we utilize to display ads, employs a DoubleClick cookie. This cookie helps deliver more relevant advertisements to you across the internet while limiting how often the same ad is shown. For further details on Google AdSense, please consult the official Google AdSense privacy FAQ.
- **Advertising Cookies:** To help cover the costs of maintaining this Website and to fund its continued development, we use advertising. The behavioral advertising cookies deployed on this Website are designed to anonymously track your interests and deliver ads that are most relevant to you based on those interests.
- **Affiliate Tracking Cookies:** We work with several advertising partners, and affiliate tracking cookies enable us to determine if visitors arrived at our Website via one of these partners. This allows us to appropriately compensate those partners and, where applicable, enable them to offer bonuses or rewards for your purchases made through their referrals.
- **Social Media Integration:** This Website features social media buttons and/or plugins that enable you to engage with your social networks. To facilitate these connections, the relevant social media platforms (including {List the social networks used on your site}) will place cookies through our site. These cookies may enhance your social media profile or contribute to the data they collect, as described in their respective privacy policies.

ENQUIRIES AND CONTACT DETAILS

Inquiries, feedback, and requests concerning this Policy are encouraged and should be directed to legal@dtg-ca.com or submitted in writing to the following address: