

**Rocktrading Ltd**

**Privacy Policy**

## **PRIVACY POLICY – DATA CONTROLLER**

Rocktrading Ltd, committed to protecting your personal data and assuming responsibility for its use, handling and confidentiality in accordance with the provisions of the Federal Law on Protection of Personal Data Held by Private Parties, hereby issues this Privacy Notice in order to inform you of the main characteristics of the processing to which your personal data will be subject.

### **PERSONAL DATA SUBJECT TO PROCESSING BY ROCKTRADING LTD**

For the purposes set forth in this Privacy Notice, Rocktrading Ltd will collect the following information directly:

- Identification data, including your image,
- Immigration data,
- Contact data,
- Location data,
- Employment data,
- Academic data,
- Asset and/or financial data, and
- Geolocation.

Likewise, Rocktrading Ltd may collect such personal data indirectly if it is provided to us by companies and/or other third parties with whom Rocktrading Ltd has entered into commercial agreements.

Rocktrading Ltd may process identification and contact data of third parties in order to validate the information you have provided and, where applicable, provide you with the corresponding benefits when such third parties are beneficiaries. By providing this information, you acknowledge that you have informed such third parties about the use of their data and have previously obtained their consent.

Due to the nature of Rocktrading Ltd's products and services, we may collect information relating to minors or persons subject to legal incapacity. The processing of such data will only be carried out when the consent of the parent, mother or legal guardian has been obtained for the purposes set forth in this Privacy Notice.

### **SENSITIVE DATA**

In order to provide you with our products and services, Rocktrading Ltd will collect the following categories of sensitive personal data:

- Biometric data, and
- Data concerning your health status.

### **PRIMARY PURPOSES**

Rocktrading Ltd will process the personal data described in this Privacy Notice for the following primary purposes:

- To comply with the contractual relationship arising from the application for and/or contracting of our products or services;
- To verify, confirm and validate your identity;
- To administer, operate and follow up on the services and products requested or contracted with Rocktrading Ltd;
- To provide you with access to the Rocktrading Ltd platform and applications, as well as the functionalities offered therein;
- To send you notifications containing information about the products or services contracted. This may include communications by email, telephone calls, text messages, and other physical, electronic and/or digital means of communication;
- To identify and prevent potential unlawful conduct that could constitute a violation of applicable laws and regulations;
- To conduct internal and external audit processes; and
- To comply with obligations established by applicable legislation and competent authorities.

## **SECONDARY PURPOSES**

Likewise, unless you object, Rocktrading Ltd may process your personal data for the following secondary purposes:

- To send you offers, promotions and advertising regarding our products and services;
- To contact you to invite you to participate in programs, activities and events organized by Rocktrading Ltd, including tests intended to improve our products and/or services;
- To create customer profiles for the offering of products and services; and
- To conduct surveys.

If you do not wish Rocktrading Ltd to process your personal data for any of the purposes described in this section, you may request this by sending an email to: [info@rocktradingltd.com](mailto:info@rocktradingltd.com).

## **TRANSFER OF PERSONAL DATA**

Rocktrading Ltd may transfer your personal data to both domestic and foreign entities without requiring your consent in the following cases:

- To the National Electoral Institute (Instituto Nacional Electoral) to validate your identity;
- To business partners with whom contracts have been entered into for the marketing of products and/or services, for the benefit and/or interest of customers, as well as to determine whether you are eligible to acquire the goods and/or services we offer;
- To courier and messaging companies for the delivery of communications related to the products and/or services contracted; and
- To competent authorities in cases provided for by law.

## **MEANS AND PROCEDURE FOR EXERCISING ARCO RIGHTS AND/OR WITHDRAWING CONSENT TO THE PROCESSING OF PERSONAL DATA**

You or your legal representative may exercise any of the rights of access, rectification, cancellation or objection, as well as withdraw your consent to the processing of your personal data, by sending an email to: [info@rocktradingltd.com](mailto:info@rocktradingltd.com).

Your request must be submitted through the ARCO Rights Request (the “Request”), which is available on the website [www.rocktradingltd.com](http://www.rocktradingltd.com) and contains all the elements necessary to process your request in accordance with applicable regulations.

In order for Rocktrading Ltd to follow up on the Request, you or your legal representative must properly prove your identity; therefore, a copy of a valid official identification document must accompany the Request.

If the information provided in the Request is incorrect or insufficient, or if the corresponding identity documents are not provided, within five (5) business days following receipt of the Request, Rocktrading Ltd may request that you provide the necessary information or documents to process it. You will have ten (10) business days to respond to such request, beginning on the day following receipt thereof. If you fail to respond within that period, the corresponding Request will be deemed not to have been submitted.

Rocktrading Ltd will communicate its determination within a maximum period of twenty (20) business days from the date on which the Request was received, so that, if applicable, you may enforce the determination within the following fifteen (15) business days after the response has been communicated. The response will be provided through the means or channel specified in your Request.

## **OPTIONS AND MEANS TO LIMIT THE USE OR DISCLOSURE OF PERSONAL DATA**

You may limit the use or disclosure of your personal data by sending an email to: [info@rocktradingltd.com](mailto:info@rocktradingltd.com). The requirements for proving your identity, as well as the procedure for processing your request, will be governed by the same criteria set forth in the preceding section. If your request is deemed admissible, Rocktrading Ltd will register you on its own exclusion list.

## **CHANGES TO THE PRIVACY NOTICE**

Rocktrading Ltd reserves the right, at its sole discretion, to change, modify, add or remove portions of this Privacy Notice at any time. In such case, Rocktrading Ltd will keep the complete and current Privacy Notice in effect on the website [info@rocktradingltd.com](http://info@rocktradingltd.com).

We recommend that you visit this page periodically in order to be informed of any changes.