

PRIVACY POLICY

INTRODUCTION

Wall ONE is a “online software as a digital services” including the website, mobile applications, social media platforms, provides add-ons, built-in services and application program interfaces.

We are committed to maintaining the accuracy, confidentiality and security of your personal information. We take all reasonable steps to ensure that this information is safe and secure, including putting in place rigorous policies and procedures to fully comply with all privacy laws and regulations.

Privacy policy may be updated in the future if there are any changes to the regulatory framework.

WHO DOES THE PRIVACY POLICY APPLY TO?

All customers, and users of our software, affiliates or associated companies.

By using this Site, you signify your acceptance of this Privacy Policy. If you do not agree to this policy, please do not use our Site, Services, apps and products.

WHAT IS PERSONAL INFORMATION?

Personal Information is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities (hereinafter: "Personal Information").

WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect and maintain different types of Personal Information in respect of the individuals with whom we interact. This includes:

- 1) contact and identification information, such as your name, billing address, telephone number and email address;
- 2) product and service related information concerning the products and services that we provide to, or receive from you; and any other information described in this Privacy Policy.

Our operations include activities related to the provision services of mathematical modelling of markets data, currency exchanges and the like with the purpose of providing reasonable information and identification of market trends for trading.

As such, we may also collect Personal Information from individuals participating in and / or impacted by those activities.

We may collect network data about you, your devices, and your use of those devices within our products or services.

WHY DO WE COLLECT PERSONAL INFORMATION?

We collect Personal Information to enable us to manage, maintain, and develop our operations, including for example:

to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;

to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;

to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;

to protect us against error, fraud, theft and damage to our goods and property;

for the purposes stated in this Privacy Policy; and any other reasonable purpose to which you consent.

HOW WE COLLECT YOUR PERSONAL INFORMATION?

We collect information about you primarily from you, but from time to time we may also collect information about you from third parties.

Your consent to the collection, use, or disclosure of your personal information may be implied or express.

We may obtain your express consent to the collection, use, and disclose your information in one of the following ways: in writing; or by electronic confirmation via the internet; or verbally, where an audio recording of the consent is retained by us; or through other methods, as long as a record of your consent is created by you, by us, or by a third party acting.

The choice to provide us with your consent to the collection, use, and disclosure of your personal and account information is always yours, however, your decision to withhold such consent may limit our ability to provide you with certain products, services, or offers.

We use limit types of technologies and the information such technologies will collect about you. For example, we may use your IP address to help diagnose problems with our server, to administer our websites, and to gather broad, aggregated demographic information about you. We may also store

your IP address when you submit a transaction for validation and to protect against fraud. Our websites may use cookies to deliver content specific to your interests, to save your password, to find your account information in our database when you access a service so you do not need to log in at every visit.

WHAT WE CAN DO WITH PERSONAL INFORMATION?

We use your personal and account information to fulfill the purpose for which it was collected.

We will disclose information about you to upon an official request by a national or international government agency and upon a subpoena by a court of law.

Your personal and account information may also be shared with other Wall ONE companies or affiliates, in order for them to assess your eligibility for their products or services; to directly provide you offers about their products or services; to confirm or authenticate your identity and ensure they have your correct and up-to-date information; to manage WALL ONE credit risk or other business risk; to better understand your needs and to serve you better; to process any offers or loyalty credits; or to detect, prevent, manage, and investigate fraud or other unauthorized or illegal activity.

We do not sell customer information to third parties, and will only disclose your personal information to organizations outside the WALL ONE Group of Companies without your consent in the following limited circumstances:

To a person who, in our reasonable judgement, is seeking the information as your agent;

To another organization upon receiving a subpoena by a court of law;

To another organization for fraud prevention, detection, and investigation if seeking consent from you would compromise the investigation;

To a law enforcement agency whenever we have reasonable grounds to believe that you have knowingly supplied us with false or misleading information or are otherwise involved in unlawful activities;

To a public authority or agent of a public authority if, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;

To a public authority or agent of a public authority, for emergency public alerting purposes, if a public authority has determined that there is an imminent or unfolding danger that threatens the life, health or security of an individual and that the danger could be avoided or minimized by disclosure of the information.;

We may send you information about other products or services that we, or our affiliates or partners, offer that may be of interest to you. If you do not want to receive such communications, all you have to do is tell us online. If you have given permission and change your mind, you can ask to be removed from future promotional communication from us.

We will not make any other disclosure of your personal information unless we have your consent or we are required to do so by law.

We may also de-identify or anonymize information about our customers to identify trends, manage our business, develop statistical information, understand how we are performing, or develop relevant products services or offers. Use of de-identified information may also be shared with third parties for other analytical purposes. De-identified or anonymized information will not personally identify any individual and therefore is not subject to this policy.

WHERE WE STORE YOUR INFORMATION?

Account and personal information about our customers may be stored or processed in or outside your place of residence. The information will be protected with appropriate safeguards, but may be subject to the laws of the jurisdiction where it is held.

HOW WE PROTECT YOUR INFORMATION?

WALL ONE has rigorous security and safeguard processes and procedures in place, to ensure that any account or personal information of our customers remains safe from theft, loss, or unauthorized access.

Your data is encrypted using the 256-bit Advanced Encryption Standard (AES-256), or better, with symmetric keys: that is, the same key is used to encrypt the data when it is stored, and to decrypt it when it is used. These data keys are themselves encrypted using a master key stored in a secure keystore, and changed regularly.

We are implement a multistep login process to allow a customer to access WALL ONE online products and services.

Our processes assist in the prevention of any unauthorized access to your account information that may arise from attempts to commit fraud or identity theft. We may change this ID validation process from time to time as industry best practices evolve.

HOW LONG PERSONAL INFORMATION WILL RETAIN?

We will only retain your account or personal information for as long as necessary to fulfill the purpose we collected the information, or for sufficient time to allow you access to the information if it was used to make a decision about you or your account. Once we no longer require your account or personal information it will be destroyed or de-identified.

WHAT IF I DISAGREE WITH THE ACCURACY OF MY PERSONAL INFORMATION?

We ensure that customer information is accurate, complete and up-to-date. Customers can ask to review that information and have the opportunity to challenge its accuracy and completeness and request amendments, as appropriate, by contacting via email.

If we receive a request for access or rectification, we may ask you to verify your identity before acting on the relevant request, to ensure your information is protected and kept secure. In any case, you are able to modify and update some of your personal information by logging into your account on our software.

You hereby agree that the stopping of processing or erasing your personal data at your wish may affect the quality of service provision and may lead to termination of agreements between Wall One and you.

MORE INFORMATION ABOUT MY PERSONAL INFORMATION?

We make its privacy policy available online at wall.one/privacy-policy. We have also appointed a member of our team to be held accountable for our privacy policy. Do not hesitate to contact us regarding a privacy policy questions, concerns, or complaints about how we collect, use, or disclose your personal information.

You can access your personal information retained by us by contacting us by email at support@wall.one.

We will respond to your requests within a reasonable time, within 30 days, unless there is a valid reason for not doing so, at which point you will be notified.