

## Privacy Policy for Summit Capital Markets

At Summit Capital Markets, protecting the privacy and security of our valued investors is a top priority. This privacy policy explains how we collect, use, and protect your personal data. Please read it carefully to understand our practices regarding your information.

### Key Points:

- **Periodic Updates:** We may update this privacy policy from time to time. We encourage you to visit this page regularly to stay informed of any changes.
- **Current Privacy Notice:** Your personal information is governed by the latest privacy notice. If significant changes are made to this policy, we will notify our investors.
- **Employee and Third-Party Handling:** If you are an employee or third-party service provider within the Summit Capital Markets group, your personal data, business policies, and contracts will be handled according to our established policies. Clear communication is a cornerstone of our operations.
- **Contextual References:** When we use terms like "our," "us," "we," or "Summit Capital Markets," we are referring to the relevant group company within the Summit Capital Markets family.

### About Us

Summit Capital Markets is dedicated to protecting the privacy and security of our investors. This policy outlines how we handle personal data, including how we collect, use, and store it. Please review it thoroughly.

### Information We Collect and Store:

In the course of our business operations, we collect personal data from investors and potential investors, including:

- **Personal Information:** Name, contact details, and other identifying information.
- **Financial Information:** Income, assets, liabilities, account balances, tax details, financial statements.
- **Employment Information:** Job status and employment history.
- **Geographical Information:** Your location and relevant regional data.
- **Trading Data:** Risk tolerance, trading history, and experience.
- **Device and IP Information:** IP addresses, device details, browsing history, and trading patterns.
- **Payment Information:** Bank accounts, credit cards, e-wallets.
- **Site and App Interaction Data:** Including traffic logs, site interactions, and communication history.

### Cookies and Data Collection:

We use cookies to enhance your experience on our website. Cookies are small text files stored on your device that allow us to remember your preferences and personalize your settings. For more information, please refer to our "Cookie Policy."

## **Business Transaction Records:**

We maintain detailed records of your transactions with Summit Capital Markets, such as:

- Products traded with Summit Capital Markets.
- Historical investment and transaction data.
- Preferences for products and services.
- For institutional investors, we may collect company information, shareholder details, and other necessary regulatory data.

## **Data Acquisition Sources:**

We collect data from various sources, including:

- Usage of our services.
- Interactions with our website and app.
- Account registrations, webinar participation, and communication records.
- Third-party sources, such as brokers, affiliates, and social media platforms.

## **Communication Records:**

We may record communications, whether electronic or phone-based, relating to our services and your interactions with us. These records serve as evidence of communications between you and Summit Capital Markets. For security, our premises may be monitored by CCTV.

## **Sharing of Personal Data:**

We may share your personal data with:

- Summit Capital Markets group companies.
- Third-party service providers (e.g., tech providers, marketing partners, payment processors).
- Auditors, consultants, contractors, and legal advisors.
- Regulatory and law enforcement authorities.
- Other third parties when necessary to enforce our agreements or when authorized by you.

We ensure that third parties receive only the necessary personal data to fulfill their obligations and adhere to privacy requirements.

## **Investor Rights and Complaints**

### **Investor Rights:**

As an investor, you have the following rights:

- **Access:** You can request access to the personal data we hold about you.
- **Correction:** You can request corrections if any of your personal data is inaccurate or incomplete.

- **Deletion:** You may request that we delete your personal data, subject to legal obligations.
- **Opt-out of Direct Marketing:** You can object to the processing of your data for marketing purposes.
- **Restriction of Processing:** You can request that we limit how we process your personal data.
- **Data Transfer:** You have the right to request that we transfer your data to another party.
- **Withdraw Consent:** If we process your data based on your consent, you may withdraw that consent at any time.

### **Investor Complaints and Requests:**

We are committed to addressing your inquiries promptly. Our approach includes:

- **Timely Responses:** We aim to respond to all requests within one month.
- **Complex Requests:** For complex or large requests, we will keep you informed and provide an estimated timeframe for completion.
- **Fees for Excessive Requests:** In some cases, we may charge a fee for repetitive, excessive, or unfounded requests. We will notify you of any charges in advance.
- **Refusal to Comply:** We may refuse to comply with requests only in exceptional circumstances, as outlined by law.

At Summit Capital Markets, we take your privacy seriously and are committed to handling your data with transparency and in compliance with relevant legal requirements. If you have any questions or need further clarification, please contact us at [support@summitcapitalmarkets.com](mailto:support@summitcapitalmarkets.com)