

PRIVACY POLICY

DP Funded (“DP Funded” or “we”) and our affiliates respect client privacy and are committed to ensuring that consumers who use or access products or services offered by us are informed regarding the way their personal data is used.

This Privacy Statement applies to dpfunded.com (“Site”) and DP Funded and governs personal data collection and usage. For the purposes of this Privacy Policy Statement (“Statement”), unless otherwise noted, all references to DP Funded include the Site and Doo Prime Vanuatu Limited, a licensed financial dealer, authorized and regulated by the Vanuatu Financial Services Commission (VU FSC).

By using the Site, you consent to the data practices described in this Statement and all revisions or amendments made to this Statement from time to time.

1. COLLECTION OF YOUR PERSONAL INFORMATION

1.1. In order to better provide you with products and services offered, we (or third-parties acting on our behalf) may collect your information, including your Personal information, when providing the website services or access to our platform, including:

- (a) Full Name
- (b) Email Address
- (c) Address
- (d) Phone Number
- (e) Country of Residence
- (f) Date of Birth / Age
- (g) IP Address
- (h) Tax Identification Number
- (i) Income
- (j) Income Source
- (k) Level of Liquid Savings and Investment
- (l) Employment Status
- (m) Employer Name
- (n) Trading Experience
- (o) Offences by way of a background check
- (p) Industry
- (q) Billing and Credit Card Information

1.2. This information is used to complete the purchase transaction or issue payments to you. We do not collect any personal information about you unless you voluntarily provide it to us. However, you

may be required to provide certain personal information to us when you elect to use certain products or services. These may include:

- (a) visiting and using our website;
- (b) registering for an account;
- (c) entering a sweepstakes or contest sponsored by us or one of our partners;
- (d) signing up for special offers from us and/or selected third parties;
- (e) customer transactions with us such as ordering our product/services, account deposits and withdrawals that require customers to provide bank account information;
- (f) communication with us including with customer service representatives and our LiveChat function

To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future for the same purpose.

- 1.3. If you request access to our trading platform and payment portal (the “Platform”), we will also collect information about your use of the Platform. The information collected through the Platform will include usage, performance, analytic and metadata and some of this may include your Personal Information. This does not include the DF Funded demo trading account (which falls within the scope of our website services as provided at Clause 1.2 above).
- 1.4. We do not collect more Personal Information than is required to open and operate customers’ accounts, and to comply with regulatory compliance and other legal obligations.

2. USE OF YOUR PERSONAL INFORMATION

- 2.1. We collect and use your personal information for various reasons, including but not limited to:

- 2.1.1. **Fulfilling requests and providing services**

- We collect information like your name and email to respond to your inquiries and provide services you've requested, such as accessing a demo account or using their LiveChat support.

- 2.1.2. **Website improvement and development**

- We analyze how you interact with our website (e.g., which pages you visit, how long you stay) to enhance the user experience and introduce new features.

2.1.3. **Administrative and policy updates**

We may inform you of any changes to our terms, policies, or other important administrative matters.

2.1.4. **Marketing and promotional activities**

If you've opted in, we may send you marketing communications (product announcements, educational materials, event invitations) and invite you to participate in promotional activities or consumer research.

2.1.5. **Personalization and analytics**

We utilize cookies and similar technologies to understand how you use their website and tailor content to your interests.

2.1.6. **Technical and security purposes**

We process your information to diagnose and resolve technical problems, as well as to monitor and protect their systems from security threats.

2.1.7. **Legal compliance**

We may process your information to comply with applicable laws, regulations, legal processes, or governmental requests.

2.1.8. **Account management and transactions**

We collect personal and payment information to provide access to their trading platform, process transactions, and comply with legal obligations.

2.1.9. **Usage data**

We collect data on how you use the platform (e.g., IP address, session duration, activities) to provide, maintain, and improve our services.

2.1.10. **Analytics data**

We gather information about platform usage, features, and user behavior to enhance the platform, understand user preferences, and develop new products.

2.1.11. **Fraud detection and risk management**

We may use automated decision-making and algorithms to analyze your transactions and create a usage profile to identify and prevent fraudulent activity.

2.2. Our website may offer access to third-party services that have their own data collection and usage practices.

- 2.3. We may combine information collected online with other information you provide, such as through their help desk.
- 2.4. We process your data based on our legitimate business interests, such as improving their services, marketing, and ensuring security, while balancing these interests with your privacy rights.
- 2.5. For any other purpose disclosed to you in connection with our services from time to time.
- 2.6. The website services may offer access to third party services. These services may collect and use your information. This Statement does not extend to third-party apps or add-ons (which may also collect your information) even if packaged by DP Funded or offered through our site.

3. DISCLOSURE OF CUSTOMER PERSONAL INFORMATION

3.1. Disclosure to Service Providers and Affiliates

- 3.1.1. DP Funded may share customer personal information with trusted third-party service providers who assist us in operating our business and providing services to you. These service providers are contractually obligated to safeguard your information and only use it for the specific purposes we authorize. This may include entities that provide IT support, data analysis, customer relationship management, marketing assistance, or other necessary functions.
- 3.1.2. We may also share your information with our affiliates or subsidiaries, who will adhere to the same privacy standards and safeguards as outlined in this policy.

3.2. Disclosure for Legal and Regulatory Compliance:

- 3.2.1. We may disclose your personal information if required by law, regulation, or legal process, or in response to a valid request from a government or regulatory authority. This may include sharing information to comply with anti-money laundering and counter-terrorism financing regulations, respond to subpoenas or court orders, or cooperate with law enforcement investigations.

3.3. Disclosure to Protect DP Funded and Others

- 3.3.1. We may disclose your personal information to protect the rights, property, or safety of DP Funded, our customers, or others. This may include sharing information to prevent fraud, investigate suspicious activity, or enforce our terms of service.

3.4. Disclosure with Your Consent or at Your Direction

3.4.1. We may share your personal information with other third parties with your explicit consent or at your direction. For example, you may authorize us to share your information with a financial advisor or another trusted third party.

3.5. Business Transfers

3.5.1. In the event of a merger, acquisition, or other business transaction involving DP Funded, your personal information may be transferred to the acquiring entity or its affiliates. We will take reasonable steps to ensure that your information continues to be protected in accordance with this Statement.

3.6. Additional Considerations

3.6.1. We may share de-identified or aggregated information that cannot reasonably be used to identify you with third parties for various purposes, such as research, analytics, or marketing.

3.6.2. We may update this Statement from time to time. We encourage you to review it periodically to stay informed about how we protect your information.

4. USE OF COOKIES

4.1. We use cookies and similar technologies (like web beacons and tracking pixels) to enhance your experience on our website, understand your preferences, and improve our services. Cookies are small text files stored on your device when you visit our website.

4.2. How We Use Cookies

4.2.1. **Essential Cookies:** These cookies are necessary for the basic functioning of our website, enabling core features like secure login and navigation.

4.2.2. **Performance and Analytics Cookies:** We use these cookies to understand how you interact with our website, track usage patterns, and identify areas for improvement. This helps us provide a better user experience.

4.2.3. **Functionality Cookies:** These cookies allow us to remember your preferences and personalize your experience, such as your language settings or region.

4.2.4. **Marketing and Targeting Cookies:** With your consent, we may use these cookies to deliver targeted advertisements and content based on your interests and online behavior.

4.3. We may also allow trusted third-party service providers to place cookies on our website for purposes such as analytics, advertising, and social media integration. These third parties are obligated to handle your information responsibly and in accordance with their own privacy policies.

4.4. You can manage your cookie preferences through your browser settings. Most browsers allow you to block or delete cookies, but please note that doing so may affect the functionality of our website. By using our website with cookies enabled, you consent to our use of cookies as described in this policy.

5. LINKS

5.1. Our website may contain links to external websites that are not operated by us. We have no control over the content and practices of these third-party sites and cannot be held responsible for their privacy policies.

5.2. We encourage you to review the privacy policy of any third-party website you visit before providing any personal information.

5.3. Please note that clicking on a link to an external site will take you away from our website. We shall not be responsible for the protection and privacy of any information you provide while visiting such sites.

6. SECURITY OF YOUR PERSONAL INFORMATION

6.1. We are committed to protecting the security and confidentiality of your personal information. We implement a variety of industry-standard security measures designed to safeguard your data from unauthorized access, use, disclosure, or alteration.

6.2. Our Security Measures Include:

6.2.1. **Encryption:** We use Secure Sockets Layer (SSL) or other encryption technologies to protect sensitive information during transmission over the internet.

- 6.2.2. **Secure Storage:** Your information is stored on secure servers with restricted access, protected by firewalls and other security technologies.
 - 6.2.3. **Access Controls:** We limit access to your personal information to authorized personnel who require it to perform their duties.
 - 6.2.4. **Regular Audits and Monitoring:** We conduct periodic internal audits and security assessments to identify and address potential vulnerabilities.
- 6.3. While we strive to protect your personal information, no data transmission over the internet or any wireless network can be guaranteed to be 100% secure. Therefore, you acknowledge that:
- 6.3.1. there are inherent risks associated with transmitting information over the internet, which are beyond our control; and
 - 6.3.2. we cannot guarantee the absolute security, integrity, or privacy of your data while it is being transmitted to or from our website
- 6.4. If you are provided with a password or other credentials to access certain parts of our website, it is your responsibility to keep these confidential and not share them with anyone.
- 6.5. Despite the inherent limitations of online security, we remain dedicated to protecting your information and will continue to implement and update our security measures to safeguard your data.

7. **RETENTION PERIOD**

- 7.1. We retain your Personal Information for varying durations based on the nature of the data and the purposes for which it was collected:
- 7.1.1. **Account-Related Data:** If you have an account with us, we will retain your Personal Information for as long as your account is active and for a reasonable period thereafter to comply with legal obligations, resolve disputes, and enforce our agreements.
 - 7.1.2. **Website Usage Data:** We typically retain website usage data, such as browsing history and cookies, for a shorter period, usually up to 12 months, unless such data is necessary for fulfilling a contract or for our legitimate business interests.

7.1.3. **Data Provided with Consent:** If you have provided your consent for us to use your data for specific purposes, such as research or marketing, we will retain your information until you withdraw your consent or the data is no longer needed for the original purpose.

7.2. We may also retain anonymized or aggregated data indefinitely for research, statistical analysis, and service improvement purposes. This data cannot be used to identify you personally.

8. **RIGHT TO DELETION**

8.1. Subject to certain exceptions and legal requirements, upon receiving a verifiable request from you, we will:

8.1.1. remove your personal information from our records; and/or

8.1.2. direct any service providers we work with to delete your personal information from their records as well.

8.2. Please note that we may not be able to fulfil your deletion request if it's necessary for us to:

8.2.1. finalize any transactions you initiated before requesting deletion, or fulfil the terms of any warranties or product recalls;

8.2.2. continue providing a service you requested or that we reasonably anticipate you'll need based on our ongoing business relationship;

8.2.3. detect and protect against security incidents, fraudulent activity, or other illegal actions;

8.2.4. identify and resolve errors that affect the intended functionality of our services.

8.2.5. protect our right or the right of others to exercise free speech or other legal rights;

8.2.6. adhere to legal obligations or participate in research in the public interest with your informed consent;

8.2.7. use your information internally in a lawful manner that is compatible with the context in which you provided it.

8.3. If we cannot delete your personal information due to one of these exceptions listed at Section 8.2 above, we will inform you of the specific reason.

9. OPT-OUT & UNSUBSCRIBE FROM THIRD-PARTY COMMUNICATIONS

9.1. We respect your privacy and provide you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from third-party partners of DP Funded by contacting us here: Email: en.support@dpfunded.com (for communication in English) or cn.support@dpfunded.com (for communication in mandarin).

10. E-MAIL COMMUNICATIONS

10.1. We may occasionally send you emails regarding announcements, promotional offers, alerts, confirmations, surveys, or other general communications. To enhance our services, we might track if you open our emails or click on any links within them. If you wish to stop receiving marketing or promotional emails from us, you can simply click on the "unsubscribe" link located at the bottom of each email.

11. EXTERNAL DATA STORAGE SITES

11.1. We may store your data on servers provided by third-party hosting vendors with whom we have contracted.

12. CHANGES TO THIS POLICY

12.1. We reserve the right to modify or update this Statement at any time. Updates will be posted on our website, so our customers will always know what information we collect, how we use it, and what choices they have. Your continued use of our services after any such modifications constitutes your acknowledgment of the updated Privacy Policy and your agreement to be bound by its terms.

13. FOR CUSTOMERS WHO ARE RESIDENT IN THE EUROPEAN UNION (EU)

13.1. Data Transfers

13.1.1. The data we process in relation to you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers.

13.1.2. We may transfer your personal information outside the EEA for the following reasons:

- a. to store your data securely in data centers located outside the EEA.
- b. to fulfill our contractual obligations to you, such as processing payments or providing customer support.

- c. when required by law or legal process.
- d. to facilitate the operation of our business, where it is in our legitimate interests and we have concluded that these interests are not overridden by your rights.

13.1.3. When transferring your data outside the EEA, we will take all necessary steps to ensure that your data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism or using Standard Contractual Clauses. We will also ensure that your data is treated securely and in accordance with this Statement.

13.2. Your Data Subject Rights

13.2.1. Under EU data protection law, you have the following rights:

- a. right to request access to your personal information and to obtain information about how we process it;
- b. right to request that we correct any inaccurate or incomplete personal information we hold about you;
- c. right to request that we erase your personal information in certain circumstances, such as when it is no longer necessary for the purposes for which it was collected;
- d. right to request that we restrict the processing of your personal information in certain circumstances, such as when you contest the accuracy of the data;
- e. right to receive your personal information in a structured, commonly used, and machine-readable format and to transmit it to another controller;
- f. right to object to the processing of your personal information in certain circumstances, such as when it is processed for direct marketing purposes;
- g. if we rely on your consent to process your personal information, you have the right to withdraw your consent at any time.

13.2.2. To exercise any of these rights, please contact us using the contact information provided in this Statement. We will respond to your request within one month of receipt.

13.2.3. Please note that certain exceptions may apply to these rights, and we may not be able to fulfil your request in all circumstances.

14. CONTACT INFORMATION

14.1. We welcome your questions or comments regarding this Policy. If you have any questions or comments, please contact us at: en.support@dpfunded.com (for communication in English) or cn.support@dpfunded.com (for communication in mandarin).

14.2. This Statement is effective as of 22 August 2024.

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