

Preamble

Glencore LLC respects your privacy and is committed to protecting and respecting your personal data. This privacy policy is intended to provide you with information on how we collect and process any personal data, i.e., information about the Client (as defined below), who is an individual, based on which this Client can be identified (hereinafter - data), in accordance with applicable data protection laws and best practices.

We aim to create the safest infrastructure among all brokers in the world. In this privacy policy, we would like to explain why you can trust us with your data and be confident in its security.

It is important for you to carefully read this privacy policy together with any other privacy policy that we may provide in specific cases when we collect or process your data so that you fully understand how and why we use your data.

In this Privacy Policy, unless the context requires otherwise, the expressions defined here have the meanings assigned to them in the Open Offer Agreement.

Please note that this Privacy Policy is addressed to current and potential Clients. If you are an employee, contractor, or third-party service provider, your personal data will be used in connection with your employment contract, contractual relationships, or in accordance with our separate policies, which are available at the contact details provided in Section 11 below.

If you participate in our affiliate program and/or broker integration program, we will process the data you provide in accordance with our agreement with you to exercise our rights and fulfill our obligations under the respective agreement, and the term "Client" in this Privacy Policy should be understood as including the term "Partner" and/or "Introducing Broker" (as applicable).

Who We Are

Marshallcapital.pro is a global brand that is operated in your jurisdiction by Glencore LLC, registered at the address registered in the Chem. du Canal 5, 1260 Nyon, Switzerland . We act as the controlling party and are responsible for the Client's data provided to us for the registration of a Trading Account, Demo Account, and/or for the use of any other services offered by us through the website (hereinafter the "Website") (this term will always include desktop and mobile versions of the Website). This Privacy Policy is issued on behalf of Glencore LLC, responsible for the collection and/or processing of your data when using the Trading Platform through the Website, both for the Trading Account and Demo Account (or their mobile/desktop versions) (hereinafter the "Services"). We respect your privacy and are committed to protecting the data we collect, use, and/or have access to. We take measures to implement advanced data protection policies and procedures and periodically update them to ensure the security of the Client's data and account. Your data is protected by legal, administrative, and technical measures that we take to ensure the confidentiality, integrity, and availability of data. To prevent security incidents with your data, we use a mixed organizational and technical approach based on the results of an annual Use of Data

3.1. We may collect, use, store, and transmit various types of data about you, which we have grouped as follows:

- Identification Data includes your name, surname, middle name (if applicable), date of birth, gender, passport information, identification number, driver's license number, and a copy of your photo.
- Contact Data includes billing address, email address, and phone numbers.
- Financial Data includes bank account information, payment card data, and tax identification number (including, but not limited to, social security number, tax identification number, national insurance number).
- Transaction Data includes details of transactions you have conducted, payment details, withdrawals, exchanges, trading history, profits, balance, deposited and withdrawn amounts, deposit and withdrawal methods, and any other details related to services you have used through our website.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technologies on the devices you use to access the website, and the use of cookies stored on your device.
- Profile Data includes details of your client account, username and password, transactions you have made, your interests, preferences, reviews, and/or information obtained during interactions with us as part of providing our services and responses to surveys.
- Usage Data includes information about how you use the website, products, and services, registration date, account category, trading cluster, number of complaints, number of submitted requests, and IP address history.
- Marketing and Communication Data includes your preferences for receiving marketing materials from us and your communication preferences.
- Special Categories of Data / "Sensitive" Data includes details about your religious beliefs, annual income, biometric data, and/or criminal offenses and convictions.
- Compliance Data includes information about education, employment status, trading experience, self-assessment test.
- Banking Data includes details about the number of payment wallets and/or information about your bank card, including information about the card issuer, card number, cardholder name, card expiration date, payment system, card verification code (CVV2/CVC2), and photos of both sides of the bank card.
- KYC Data (Know Your Customer) includes information about identity documents, including copies of recent utility bills, identity cards, passports, and/or driver's licenses.
- Economic Profile Data includes details about profession, investment goals, annual income, net worth, expected annual investment amount, and sources of funds.
- Location Data includes details about your actual location when interacting with our website (e.g., a set of parameters determining the regional settings of your interface, such as country of residence, time zone, and interface language).

- Audio Data includes full voice recordings of calls you receive from us or make to us (collectively referred to as Personal Data).

3.2. Aggregate Data includes statistical or demographic data for any purpose. Such data may be derived from your data but is not considered personal data in law, as it will not directly or indirectly reveal your identity. Examples of Aggregate Data include aggregating your Usage Data to calculate the percentage of users accessing a specific website feature and/or preferences for products/services. However, if we combine Aggregate Data with data in such a way that it can identify you, we treat the combined data as personal data, which will be processed in accordance with this policy. We collect and process Personal Data for any of the following reasons:

- To perform our contract with you;
- To comply with our legal obligations, including, without limitation, applicable laws and regulations related to anti-money laundering (AML); and/or
- To protect our legitimate interests.

How Your Personal Data Is Collected

Direct Interactions. You may provide us with your Identification, Contact, and Financial Data online through the website and/or by filling out online forms and/or by corresponding with us via email or other means. Data may be provided by you when you want to:

- Register for a Trading Account;
- Register for a Demo Account;
- Subscribe to our publications and updates;
- Request us to send you marketing and promotional materials;
- Participate in a contest, promotion, or survey; and/or
- Provide us with feedback or contact us. We are required to collect the above-mentioned data to (i) provide our services efficiently, (ii) comply with our existing legal obligations, including, among other things, fraud prevention and anti-money laundering efforts. If you fail to provide the requested data, we may not be able to perform the contract we have with you or are trying to enter into with you (e.g., provide you with our services). In this case, we may need to cancel the service you have received from us, but we will notify you at the time. It is important that the data we hold about you is accurate and up-to-date. Please inform us if your data changes during your interaction with us. Automated data risk assessment. We will not disclose any personal information of our Clients and former Clients unless the Client approves such disclosure in writing or if such disclosure is required by applicable law or necessary for identity verification of the Client, or if it is necessary to fulfill our contractual obligations under any agreement concluded with the Client. Information about Clients is processed only by our employees and/or trusted third parties providing specific services necessary for the provision of our services. All such information is stored on electronic and physical media in accordance with applicable law.

"Technologies or interactions. When using our services, your device automatically transmits its technical characteristics to us. Locale (a set of parameters defining the regional settings of your interface, such as country of residence, time zone, and interface language) is used to provide you with the best possible service on our platform. The use of information about the IP address, cookies, browser information, and the operating system used, as well as the date and time of access to the site and requested page addresses, allows us to ensure the optimal functioning of our web application, mobile, and/or desktop versions of our application and to track your behavior for the purpose of improving the effectiveness and convenience of using our services. We use web analytics tools to track the performance of our website and the source of user marketing with the help of cookies to optimize our marketing expenses and provide users with the best experience. You can request at any time that we refrain from such transmissions (to the extent possible and in accordance with our legal obligations) Privacy Policy – Glencore LLC. 7, by sending your request to the DPO using our contact details in the "Our Contact Details" section below, using the registered email address you provided and registered with us through your account. We will consider your request within 30 business days. About "cookies": A "cookie" is a small amount of data, often including a unique identifier, sent to your computer or browser device from a website's computer and stored on your device's hard drive to track website usage. The website can send its own "cookies" to your browser if your browser's settings allow it, but to protect your privacy, your browser only allows the website to access "cookies" that it has already sent to you, not "cookies" sent by other websites. Many websites do this when a user visits their website to track online traffic flows. When you visit our website, our system automatically collects information about your visit, such as your Technical data, including, among other things, your browser type, your IP address, and the link to the previous website you visited. The purpose of using your data and on what legal grounds 5.1. We process the above-mentioned data in accordance with applicable laws that change over time in order to (i) be able to fulfill our contractual obligations to the Client and offer them the best possible service, (ii) effectively provide our services, (iii) comply with our legal obligations, including, among other things, combating fraud and money laundering, and (iv) protect our legitimate interests and your vital interests. 5.2. We process all data on the following legal grounds:

- To comply with our legal obligations;
- To fulfill our contractual obligations to the Client;
- To protect our legitimate interests, and your interests and fundamental rights do not outweigh these interests; and/or
- Based on your consent. Indicatively, we provide a description of all the ways in which we plan to use your data, and on what legal grounds we rely for this. We have also identified our legitimate interests where appropriate. Please note that we may process data on more than one legal basis, depending on the specific purpose for which we use your data.

5.3. If you are a current client of the Website, where we have a legitimate interest in communicating with you, or if you have given us your consent, we will collect and process your personal data to communicate with you in case of support and/or sending informational newsletters, push notifications, and calls to keep you informed of our new features, news, and events, as well as to provide effective delivery of our full range of services. We will also use your data to send you marketing information about our services that we believe may be of interest to you by email or other means.

5.4. Our Website is not intended for children, and we do not knowingly collect data related to children. Since we do not allow users under the age of 18 to use our services, we need to obtain your date of birth to confirm age verification for clients."

Opting Out

If you do not wish to receive advertising newsletters or have your data shared with third parties for marketing purposes, you can customize your preferences. You can make this adjustment by (i) opening your account or (ii) when receiving such advertising content, or (iii) by logging in and going to the "My Account" > "Profile" > "Notification Settings" section. You can also send us an email at info@marshallcapital.pro at any time, using the registered email address you provided and registered with us through your account, and request us to stop sending such advertising content or sharing your data with third parties for marketing purposes. The above request for unsubscribing and/or the received info@marshallcapital.pro email obligates us to stop sending advertising content to you within 7 (seven) business days.

Data Disclosure

We may share your data with third parties in accordance with the purposes mentioned above. We take all reasonable measures to ensure that our third-party service providers do not use your personal data for their own purposes and only allow them to process your data for specific purposes and in accordance with our instructions. In general, your data is used by our processors. Additionally, the transfer of your data to another legal entity may occur as part of the transfer of our business or its parts in the form of reorganization, asset sale, consolidation, merger, or similar. Regarding the transfer of data to recipients outside our affiliated and/or affiliated entities, we note that we strive to maintain confidentiality regarding customer matters and assessments we receive. We may disclose data related to you only 1. If it is necessary to comply with our legal obligations; If it is necessary to protect your vital interests. if (i) we are legally obliged to do so; (ii) if required when you explicitly request us to process a transaction or any other service, and (iii) it is necessary to provide our services within the framework of our contractual relationship and/or (iv) to protect our legitimate interests and applicable laws that change over time. To external third parties. Your data may be shared with third parties, including but not limited to: A. Service Providers. We may share your data with our trusted third-party service providers who, on our behalf, manage, support, and maintain our IT systems and IT infrastructure, our websites, manage our payment solutions, perform statistical analysis, marketing and advertising purposes, send newsletters, provide customer support, and perform other important services for us. B. Other related and/or affiliated entities. We may also disclose your data to other affiliated companies of finex.pro so that they can provide us with relevant services. C. Government Authorities. Your data, which is provided by you or will be provided by you during your activity on the Website, may be disclosed by us to official authorities. We will make such disclosures only if required to disclose by applicable law or by court order and to the minimum extent necessary. D. Other Disclosures. In addition to cases where you have given consent to data disclosure or where disclosure is necessary to achieve

the purpose(s) for which they were collected, data may also be disclosed in special situations where we have reason to believe it is necessary to identify, contact, or bring legal action against someone who may be causing harm, interfering with, intentionally or unintentionally, our rights or property, users, or any other persons who could be harmed by such actions, or in other cases where it is necessary to establish, exercise, or defend legal claims. To the extent possible, management will ensure that third-party

Data Storage

We retain your data for as long as reasonably necessary to achieve the purposes for which we collected them, including fulfilling any legal, tax, accounting, or reporting requirements. We may keep your personal data for a longer period in case of a complaint or if we have reasonable grounds to believe that there is a prospect of legal proceedings regarding our relationship with you. To determine the appropriate retention period for your data, we consider the amount, nature, and sensitivity of the data, potential risks of unauthorized use or disclosure of your data, the purposes for which we process your data, and whether we can achieve these purposes by other means, as well as applicable legal, tax, accounting, and other requirements. We will retain your data (including voice recordings of conversations) during our contractual relationship and for a minimum period of 7 (seven) years from the date of your discontinuation of service usage. In general, all other data is retained for 30 (thirty) business days after the date of discontinuation of our services unless there is another legal reason for their storage. Upon the expiration of the data retention period, they are irreversibly destroyed, and we also inform all third parties to whom the data has been transferred of such deletion and request them to take similar actions on their part.

Your Rights and How to Withdraw Consent and Unsubscribe

We ask that you provide us with truthful, accurate, and up-to-date information about your identity and do not misrepresent yourself as another person or legal entity. Any changes to your identification data must be promptly communicated to us and in any case no later than the 7th day from the date of such changes. If your data is incorrect or incomplete, please contact us using the contact information provided in Section 11. Our contact details below to update your data. In certain circumstances, you have rights in accordance with applicable law and our policies, which may change over time. Some of these rights are quite complex and include exceptions, so we strongly recommend that you contact us (using the contact information provided in Section 11. Our contact details below). In this section, you will find a brief description of your rights.

A. Right to Access. You have the right to confirm whether we process your data. In addition, you have the right to obtain more detailed information about the stored data and the processing carried out by us, and in certain circumstances the right to receive a copy of this data. To access and view your data without downloading it, please contact our support service and request data provision by logging into your account, going to the "Help" section, selecting "Support Service," and submitting your request. In

addition, you have the right to obtain more detailed information about the stored data and the processing carried out by us, and in certain circumstances the right to receive a copy of this data.

B. Right to Rectification. You have the right to correct inaccurate data about you and, taking into account the purposes of processing, to complete incomplete data.

C. Right to Erasure. This allows you to request us to delete personal data or remove them if there are no legitimate reasons to continue processing them. To delete your account and all personal information stored in our system, you need to log into your account, go to the "Profile" section, and then at the bottom of the page, make your request by selecting "Delete my account." However, please note that we may not always be able to comply with your request for deletion for specific legal reasons that will be communicated to you as needed at the time of your request. If you want to get full deletion of your data (in accordance with the "right to be forgotten"), please note that we may not always be able to comply with your request for deletion for specific legal reasons that will be communicated to you as needed at the time of your request.

D. Right to Restriction of Processing. You have the right to request the restriction of the processing of your personal data if (a) they are inaccurate; (b) the processing may be unlawful, but you do not want us to delete your data; (c) you need us to store the data, even if we no longer need it; or (d) you have objected to the use of your data by us, but we need to verify whether we have compelling legitimate grounds for their use.

E. Right to Data Portability. If the legal basis for processing is your consent, and such processing is carried out by automated means, you have the right to receive your data in a structured, commonly used, and machine-readable format. However, this right does not apply if it would adversely affect the rights and freedoms of others and/or in case of technical impossibility. F. Right to Object. Depending on the legal basis for processing, you may object to the processing of your personal data. Please note that in some cases we may have compelling legal grounds for processing your data that we need to comply with.

G. Right to Withdraw Consent. To the extent that the legal basis for processing is your consent, you have the right to withdraw this consent at any time. The withdrawal of consent does not affect the legality of processing carried out before the withdrawal. If you withdraw your consent, we may not be able to provide certain products or services to you. We will inform you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact us using the contact information provided in Section 11. Our contact details below. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Data Security

We have taken appropriate security measures to prevent accidental loss, unauthorized use, or access to your data, as well as their alteration or disclosure. Furthermore, access to your data is restricted only to employees, agents, contractors, and other third parties who need it to perform business tasks. They will process your data only according to our instructions and are subject to confidentiality obligations.

We have developed procedures for responding to suspected data breaches and will notify you of any such breaches if required by law. Your assistance is always valuable in ensuring the security of your data. When registering on the website (or its mobile version), the Client will be prompted to choose a username and password to use for each subsequent login, transaction, and service usage. To protect the Client's confidentiality and work with the website, sharing registration data (including, among other things, the username and password) with other individuals or legal entities is strictly prohibited. We are not responsible for any damage or loss that may occur to the Client as a result of improper use (including prohibited and unprotected use) or storage of such username and password, including any such use made by a third party, whether known or authorized by the Client.

Any use of the website with the Client's username and password is the sole responsibility of the Client. We are not responsible for such use, including confirming that the Client is indeed acting in their account.

The Client is obliged to immediately notify us of any suspicions in the event of unauthorized use of the Client's account. You can contact us at any time using the contact points listed in Section 11. Our contact details below.

Encryption of Your Data During Transmission. Encryption provides a high level of security and confidentiality for your data. When you enter your data on our platform, we use reliable encryption technologies (such as Transport Layer Security) to protect your data during transmission from your devices to our servers.

To ensure greater trust and security, we use Extended Validation (EV) digital certificates from trusted certificate authorities. In supported browser versions, you can see a "Green Bar" confirming the security of transmitted data.

Protecting Your Data in Our Infrastructure. We adhere to the principle that our services should be secure by default. "Secure by default" means that all new services and features are developed with stringent security requirements before development begins. This is a key point in guaranteeing the protection and confidentiality of all data that our services work with and store as soon as the service or new feature is released.

To protect your data, we use pseudonymization, which allows most of our services to operate without using your actual data. Instead, our services use a system identifier that cannot be traced back to identify you.

If you want to exercise any of the rights mentioned above and/or get additional information about your rights and/or our policies and procedures, please contact us through the contact points listed in Section 11. Our contact details below. Please also provide us with the relevant information to process your request, including your full name and email address so that we can identify you. We will respond to your request without undue delay.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your data (or exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you informed.

"We are always vigilant about the security of your data stored in our infrastructure. As a result, all our equipment used for processing your data is placed in secure data processing centers. Access to this equipment from the internet is isolated. We use network segmentation to isolate services requiring different levels of security from each other. Furthermore, we restrict logical access to your data for our employees on a 'need-to-know' basis. Thus, only staff who genuinely need access to your data to provide you with our best service will have access to it.

Protection against threats: We are well-informed about modern security and data privacy threats and are ready to combat them. All events occurring in our infrastructure are continuously monitored, analyzed, and responded to, allowing us to ensure the proper protection of your data from threats, vulnerabilities, and malware.

In the event of a failure affecting the availability of your data, we have backup and recovery procedures in place that can quickly restore your data. To ensure fast recovery, we use a high availability mode activated for the most critical databases, allowing us to minimize downtime.

Employee awareness of data security: Our employees may handle your data to provide you with top-notch service. To ensure the security and confidentiality of your data, we monitor the actions of all

employees who have access to your data in our systems and provide access strictly on a 'need-to-know' basis: only employees who require access will receive it. We conduct regular training sessions to ensure that every employee understands the principles we follow to ensure data security reliability and confidentiality.

If you decide not to provide your personal information: In the context of our business interaction, we may need to collect data in accordance with the law or the terms of the contract we have with you. Without this data, we generally cannot enter into or fulfill a contract with you. If you choose not to provide us with this data, it may delay or prevent the fulfillment of our obligations. It may also mean that we cannot provide the services necessary to work with your accounts or policies."

"Links to Other Websites

We may provide links to third-party websites on our website. These linked websites are not under our control, and therefore, we cannot be held responsible for the actions of third parties associated with our websites, including but not limited to the collection or disclosure of your data. Before disclosing your data on any other website, we strongly recommend reviewing the terms of use and privacy policies of that website."