

PRIVACY POLICY

VITTAVERSE LTD

PRIVACY POLICY

	1
0. Introduction and Status of this Policy	1
1. Definitions	1
2. What We Collect	2
3. How We Use Your Personal Data	3
4. Legal Bases for Processing	3
5. How We Share Your Personal Data	4
6. International Transfers	4
7. Data Retention	5
8. Your Rights and Choices	5
9. Cookies and Tracking Technologies	5
10. Security and Confidentiality	6
11. Third-Party Websites and Services	6
12. Updates to this Policy	6
13. Contact	6
Governing Language	6



0. Introduction and Status of this Policy

0.1 This Privacy Policy (the “Policy”) explains how Vittaverse Ltd, incorporated in St. Vincent & the Grenadines (the “Company”, “we”, “us”, “our”), collects, uses, stores, shares, and protects personal data when you use our website, client portal, trading platform(s), and related services (the “Services”).

0.2 This is a client-facing policy. Where referenced and/or incorporated by reference into the Company’s Client Services Agreement or other applicable terms, this Policy forms part of the contractual relationship between you (the “Client”, “you”, “your”) and the Company.

0.3 By using the Services or by providing personal data to us, you acknowledge that you have read and understood this Policy.

0.4 This Policy is drafted to be jurisdiction-neutral and applies alongside any Applicable Regulations. Where mandatory data protection rules apply to you, the Company will apply them to the extent required.

1. Definitions

1.1 “Applicable Regulations” means all applicable laws, regulations, rules, guidance and binding obligations relating to privacy, data protection, confidentiality, AML/CTF, financial services, and related matters, as amended from time to time.

1.2 “Personal Data” means information that identifies you or can reasonably be linked to you (directly or indirectly).

1.3 “Processing” means any operation performed on Personal Data (collection, recording, storage, use, disclosure, transfer, deletion, etc.).

1.4 “Trading Platform” means any platform or application made available by the Company (including third-party platforms integrated with our services).

2. What We Collect

We may collect and process the following categories of Personal Data, depending on how you use the Services:

2.1 Identification and KYC Data: name, date of birth, nationality, identification numbers, copies of identity documents, selfies/liveness checks, proof of address, and other verification information.



2.2 Contact Data: email address, phone number, residential address, correspondence address, and communication preferences.

2.3 Financial and Payment Data: deposit/withdrawal records, payment method identifiers, bank account details (where provided), wallet addresses (crypto), transaction hashes, and related payment verification information.

2.4 Account and Trading Data: account numbers/IDs, login details (hashed/secured), trading history, open/closed positions, orders, balances, margin and equity metrics, platform activity logs, and related analytics.

2.5 Profile and Suitability-Related Data (where applicable): occupation, employer/business activity, income/wealth indicators, source of funds/wealth information, and trading experience/history, including data you provide during onboarding or later reviews.

2.6 Technical and Usage Data: IP address, device identifiers, device type, operating system, browser type, app version, time zone, language settings, cookies/trackers, log files, crash reports, and usage patterns across the Website, portal, and Trading Platform.

2.7 Communications Data: records of communications with us, including emails, chats, tickets, and where applicable call recordings and other electronic communications.

2.8 Location Data (where applicable): general location derived from IP address and, if you use mobile services and enable permissions, device-based location signals.

2.9 Third-Party Data (where applicable): information received from service providers such as identity verification partners, payment processors, sanctions/PEP screening providers, analytics providers, and fraud prevention services.

3. How We Use Your Personal Data

We use Personal Data for the following purposes:

3.1 To Provide and Administer the Services: account creation, identity verification, enabling platform access, processing deposits/withdrawals, executing transactions, providing statements and reporting, customer support, and communications.

3.2 To Comply with Legal and Regulatory Obligations: AML/CTF, sanctions compliance, fraud prevention, record keeping, responding to lawful requests from authorities, and enforcement of our terms.



3.3 Security, Risk Management and Integrity of the Services: protecting accounts, preventing unauthorised access, detecting suspicious activity, preventing abuse, managing operational risk, and improving system reliability.

3.4 Monitoring and Recording (Carried Over from the Previous Agreement):

To comply with Applicable Regulations and for legitimate business purposes, the Company may monitor and record communications (including, where applicable, telephone calls, emails, chat messages, tickets, and other electronic communications) and may monitor account and platform activity for:

- a) regulatory compliance and audit;
- b) prevention/detection of financial crime and fraud;
- c) security and operational integrity;
- d) quality control and service improvement; and
- e) staff training.

3.5 Analytics and Improvement: improving user experience, platform performance, service features, and internal processes.

3.6 Marketing and Updates (where permitted): informing you about service updates, platform changes, and marketing communications where you have opted in or where permitted by Applicable Regulations. You may opt out of marketing at any time.

3.7 Legal Claims and Dispute Management: establishing, exercising, or defending legal claims, investigating disputes, and enforcing contracts.

4. Legal Bases for Processing

We process Personal Data based on one or more of the following grounds (as applicable and permitted):

- a) Contract (to provide and administer the Services);
- b) Legal obligation (compliance with Applicable Regulations, AML/CTF, recordkeeping, authority requests);
- c) Legitimate interests (security, fraud prevention, risk management, product improvement, service quality);
- d) Consent (where required, such as certain cookies or marketing preferences); and/or
- e) Vital interests (rare situations involving protection of individuals or legal requirements).

5. How We Share Your Personal Data

We may share Personal Data with:

5.1 Service Providers and Suppliers: IT hosting, cloud providers, CRM and support tools, analytics providers, identity verification vendors, fraud prevention vendors, sanctions/PEP screening vendors, and other vendors needed to operate the Services.

5.2 Payment and Banking Partners: banks, payment processors, card providers, e-wallet providers, crypto payment facilitators, and other payment counterparties for processing deposits/withdrawals and related verification.

5.3 Trading and Liquidity Service Partners: platform providers, technology providers, liquidity providers, and counterparties (where relevant to execution, settlement, risk management, and operational support).

5.4 Professional Advisers: legal advisers, auditors, accountants, consultants, and insurers.

5.5 Authorities and Legal Process: regulators, law enforcement, courts, and competent authorities where required by Applicable Regulations, court orders, subpoenas, or lawful requests, or where necessary to prevent crime, enforce terms, or protect rights and safety.

5.6 Corporate Transactions: in connection with a merger, acquisition, financing, restructuring, or sale of assets (subject to confidentiality and applicable safeguards).

We do not sell Personal Data to third parties.

6. International Transfers

6.1 Your Personal Data may be processed and stored in countries other than your country of residence and/or countries that may not provide the same level of data protection as your jurisdiction.

6.2 Where international transfers occur, the Company will take reasonable steps to apply appropriate safeguards, such as contractual protections, technical safeguards, and access controls, in line with Applicable Regulations and risk considerations.

6.3 By using the Services and providing Personal Data, you acknowledge that such international transfers and processing may occur as described above.



7. Data Retention

7.1 We retain Personal Data only for as long as necessary for the purposes described in this Policy, including to provide the Services, comply with legal and regulatory obligations (including AML/CTF retention), resolve disputes, enforce agreements, and protect against fraud and abuse.

7.2 Retention periods may vary depending on:

- a) the type of data;
- b) the nature of the relationship and transactions;
- c) regulatory or legal requirements; and
- d) ongoing investigations or disputes.

7.3 We may retain and use certain information even after account closure where required by Applicable Regulations or where necessary for legitimate purposes (e.g., fraud prevention and legal claims).

8. Your Rights and Choices

Depending on your jurisdiction and Applicable Regulations, you may have rights to:

- a) request access to Personal Data we hold about you;
- b) request correction of inaccurate data;
- c) request deletion of Personal Data (where lawful and subject to mandatory retention);
- d) object to certain processing or request restriction;
- e) request data portability (where applicable); and/or
- f) withdraw consent (where processing is based on consent).

To submit a request, contact us at support@vittaverse.com. We may need to verify your identity before processing requests.

9. Cookies and Tracking Technologies

9.1 We may use cookies and similar technologies on the Website and/or platforms to enable functionality, improve performance, analyse usage, and support security.

9.2 Cookies may include:

- a) Strictly Necessary cookies (required for core functionality and security);
- b) Performance/Analytics cookies (to analyse usage and improve services);
- c) Functional cookies (to remember settings); and
- d) Marketing cookies (where enabled and permitted).

9.3 You can manage cookies via your browser settings and, where available, the cookie banner/preferences tool. Disabling certain cookies may affect functionality.

10. Security and Confidentiality

10.1 We implement appropriate technical and organisational measures to protect Personal Data against unauthorised access, loss, misuse, alteration, or disclosure.

10.2 No system is completely secure. You are responsible for keeping your account credentials confidential and notifying us immediately of any suspected unauthorised access.

11. Third-Party Websites and Services

11.1 Our Website or Services may contain links to third-party sites or tools. We are not responsible for their privacy practices. You should review third-party privacy policies separately.

12. Updates to this Policy

12.1 We may update this Policy from time to time. Updated versions will be made available on the Website and/or upon request. Continued use of the Services after an update constitutes acceptance of the updated Policy to the extent permitted by Applicable Regulations.

13. Contact

13.1 For privacy questions or requests, contact: support@vittaverse.com

13.2 If you contact us, we may retain a record of that correspondence in accordance with this Policy and Applicable Regulations.

Governing Language

If this Privacy Policy is translated, the **English version shall prevail** in case of any inconsistency.

Vittaverse Global Markets Ltd

Document Code: VT-PRIV-001

Last Updated: January 2026

