

Privacy Policy

1. Introduction

Brave Ltd (“Brave”, “the Company”, “we”, “us”), operating the Brave Markets brand at www.bravefx.trade, is committed to protecting the privacy of its clients, prospective clients and website visitors. This Privacy Policy explains what personal data we collect, why we collect it, how we use, share and protect it, how long we keep it, and the rights you have in relation to it. It applies to all personal data processed in connection with our websites, trading platforms, applications and services.

By registering for an account, using our website or services, or otherwise providing personal data to us, you acknowledge that your data will be processed as described in this Policy. This Policy should be read together with our Client Agreement and any other notices we provide when we collect or process your data. The Company is the data controller in respect of the personal data it processes.

2. Personal Data We Collect

We collect personal data in the following categories:

- **Identity data** — name, date and place of birth, nationality, gender, passport, national identity card or driving licence details, photographs and other identity verification material.
- **Contact data** — residential address, email address and telephone numbers.
- **Financial and due-diligence data** — bank account and payment details, source of funds and wealth, employment status, income, net worth, tax residency and tax identification numbers, and information obtained from credit reference, fraud prevention and sanctions screening agencies.
- **Trading and transaction data** — account numbers, deposits and withdrawals, orders, positions, trading history and account balances.
- **Profile and suitability data** — trading knowledge and experience, investment objectives and answers to appropriateness or suitability questionnaires.
- **Technical and usage data** — IP address, device identifiers, browser type and version, operating system, time-zone setting, login records, pages visited and actions taken on our website and platforms.
- **Communications data** — records of telephone calls, emails, live chats and other correspondence with us, which may be recorded and retained.
- **Marketing preferences** — your preferences in receiving marketing from us and your communication preferences.

We collect this data directly from you (for example, through the Account Opening Application Form or your use of the website), automatically (through cookies and similar technologies), and from third parties such as identity verification providers, credit reference and fraud prevention agencies, banks, payment providers and public registers.

3. How and Why We Use Your Data

We process personal data for the following purposes:

- to assess and process your account application, verify your identity, and perform anti-money-laundering, counter-terrorist-financing, sanctions and fraud checks required by law;
- to open, administer and service your trading account, execute and settle your orders, process deposits and withdrawals, and provide client support;
- to assess the appropriateness of our products for you and to categorise you as a client;

- to comply with our legal and regulatory obligations, including record-keeping, reporting to authorities, and FATCA and CRS reporting for reportable persons;
- to monitor, detect and prevent fraud, market abuse, abusive trading and other misuse of our services;
- to manage risk, enforce our agreements and establish, exercise or defend legal claims;
- to operate, secure, maintain and improve our websites, platforms and services, including analytics, testing and troubleshooting; and
- with your consent or as otherwise permitted by law, to send you marketing about products, services, promotions and events that may interest you. You may opt out of marketing at any time using the unsubscribe link in our messages or by contacting us.

We process your data where necessary to perform our contract with you, to comply with legal obligations, for our legitimate interests (such as securing our systems, preventing fraud and improving our services) where those interests are not overridden by your rights, or with your consent where consent is required.

4. Recording of Communications

Telephone conversations, emails, chats and other communications between you and the Company may be recorded and retained. Recordings are the sole property of the Company and may be used as evidence of orders, instructions or conversations, for quality and training purposes, and to comply with regulatory record-keeping obligations.

5. Sharing Your Data

We do not sell your personal data. We may share it, on a need-to-know basis and subject to appropriate safeguards, with:

- companies within our corporate group and associated companies, for the purposes described in this Policy;
- service providers acting on our behalf — including identity verification, payment processing, IT hosting, platform, communications, record-keeping, analytics and marketing providers;
- liquidity providers, execution venues, banks and other financial institutions necessary to execute and settle your transactions and process payments;
- credit reference, fraud prevention and sanctions screening agencies, and authentication providers, for identity, credit and due-diligence checks;
- regulators, courts, law-enforcement bodies, tax authorities and other public authorities where required by law or to protect our legal rights, including for FATCA and CRS reporting; and
- professional advisers, auditors, insurers, and prospective or actual successors, assignees or buyers in connection with a merger, acquisition, reorganisation or sale of all or substantially all of our business or assets.

Where we share data with third parties, we require them to protect it and to use it only for the specified purposes, and we permit them to use it for their own purposes only where the law allows.

6. International Transfers

Because the Company and some of its service providers, group companies and financial institutions operate in different countries, your personal data may be transferred to, stored in and processed in jurisdictions outside your country of residence and outside Saint Lucia, where data-protection laws may differ. By accepting this Policy and entering into the Client Agreement, you consent to such transfers. Where we transfer your data internationally, we take reasonable steps to ensure that it is treated securely and in accordance with this Policy and applicable law.

7. Cookies and Similar Technologies

Our website uses cookies and similar technologies to make it function, to remember your preferences, to analyse traffic and usage, and to support marketing. Some cookies are strictly necessary for the site to work; others are optional and used only where permitted. You can control non-essential cookies through your browser settings or any cookie preference tool we provide; disabling certain cookies may affect the functionality of the website. Where required, we will seek your consent before placing non-essential cookies.

8. Data Retention

We keep your personal data only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy our legal, regulatory, accounting and reporting obligations and to establish, exercise or defend legal claims. Under applicable regulations, we retain records relating to your account, trading, communications and identification for at least five (5) years after the termination of the Client Agreement or of a transaction, and longer where a longer period is required by law or is necessary for legal proceedings. When data is no longer required, we securely delete or anonymise it.

9. Data Security

We implement appropriate technical and organisational measures designed to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage, including access controls, encryption in transit where appropriate, and staff confidentiality obligations. No method of transmission over the internet or of electronic storage is completely secure, however, and we cannot guarantee absolute security. You are responsible for keeping your Account Credentials confidential and for notifying us promptly of any suspected compromise.

10. Your Rights

Subject to conditions and to applicable law, you have the following rights in relation to your personal data:

- to request access to the personal data we hold about you and information about how we process it;
- to request correction of inaccurate or incomplete data;
- to request erasure of your data where there is no good reason for continued processing, where you have successfully objected, where processing was unlawful, or where erasure is required by law — noting that we may be unable to comply where retention is required by law;
- to object to processing based on our legitimate interests, and to object at any time to processing for direct marketing;
- to request restriction of processing in defined circumstances;

- to request the transfer of certain data to you or a third party in a structured, commonly used, machine-readable format; and
- to withdraw consent at any time where processing relies on consent, without affecting the lawfulness of prior processing.

An administrative fee may apply to certain requests where permitted by law. To exercise any of these rights, or if you have questions or complaints about how we handle your data, please contact us at privacy@bravefx.trade. We will respond within the period required by applicable law. You also have the right to lodge a complaint with a competent data-protection authority.

11. Marketing and Your Choices

Where you have consented, or where otherwise permitted by law, we may send you marketing communications by email, telephone, SMS or other electronic means about products, services, promotions and events. You can opt out at any time by using the unsubscribe mechanism in our communications, by updating your preferences in your Personal Area, or by contacting us at support@bravefx.trade. Opting out of marketing does not affect service communications necessary to administer your account.

12. Children

Our services are not directed at, and we do not knowingly collect personal data from, persons under the age of 18. If we become aware that we have collected data from a person under 18, we will take steps to delete it.

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements or other factors. The current version is always available on our website, and material changes will be notified as required by law. Your continued use of our services after any update constitutes acceptance of the revised Policy.

14. Contact Us

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact us at privacy@bravefx.trade or write to us at our registered office in Saint Lucia.