



Fintana

Privacy & Cookies Policy

Version 1 – October 2023





1. Introduction

Cosmos Sol Capital Limited, (hereinafter “Fintana” or the “Company”), is duly incorporated under the laws of the Republic of Mauritius and bears Company registration number 197666 The Company is duly licensed by the Financial Services Commission of Mauritius and hold an Investment Dealer (Full Service Dealer, excluding Underwriting) license with license number GB23201338.

We understand the importance of maintaining the confidentiality and privacy of personal information that we hold about our clients and other third parties. This Policy (hereinafter this ”Policy”) outlines how we manage and protect the personal information you give us and hold about our clients. By visiting our website and using our services, your agreement to this Policy is implied.

This Policy will be reviewed periodically to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. You should check this Policy from time to time to ensure that you are happy with any changes. Any information held will be governed by our most current Policy.

2. Collection of personal information

We receive your Personal Information from various sources:

When you voluntarily provide us your personal details in order to create an account (for example, your name and email address);

When you use or access our site and services, in connection with your use of our services (for example, your financial transactions);

From third party providers and services, such as credit reference agencies, fraud prevention agencies, identity verification vendors, banks, authentication service providers and public registers.

3. What type of information we collect?

In order to open an account with the Company, and in order to provide you with our services we will need you to collect the following information:

- Personal Information

We collect the following Personal Information about you:

Registration information – your name, email address, phone number, occupation, country of residence, and your age (in order to verify you are over 18 years of age and eligible to participate in our service).

Voluntary information – when you communicate with us (for example when you send us an email or use a “contact us” form on our site) we collect the personal information you provided us with.

Financial information – by its nature, your use of our services includes financial transactions, thus requiring us to obtain your financial details, which includes, but not limited to your payment details (such as bank account details and financial transactions performed through our services).

Technical information – we collect certain technical information that is automatically recorded when you use our services, such as your IP address, MAC address, device approximate location.



- **Non-Personal Information**

We record and collect data from or about your device (for example your computer or your mobile device) when you access our services and visit our site. This includes, but not limited to: your login credentials, UDID, Google advertising ID, IDFA, cookie identifiers, and may include other identifiers such your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us.

If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

- **Tracking Technologies**

When you visit or access our services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies ("Tracking Technologies"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our services, improve our site's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information.

4. How do we use the information we collect?

- **Provision of service** - we will use your Personal Information you provide us for the provision and improvement of our services to you.
- **Marketing purposes** - we will use your Personal Information (such as your email address or phone number). We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Information, for marketing purposes.
- **Analytics, surveys and research** - we are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyse the information we have to develop, evaluate and improve these features.
- **Protecting our interests** - we use your Personal Information when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property COSMOS SOL CAPITAL LTD., its users and/or partners.
- **Compliance with legal and regulatory requirements** - we also use your Personal Information to investigate violations and prevent money laundering and perform due diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

5. How we use cookies

When you use our website, we will use cookies to distinguish you from other users of our website. This helps us to provide you with a more relevant and effective experience when you browse our website, including presenting websites according to your needs or preferences and allows us to improve the site generally.



6. Disclosure of the personal information

The Company shall not disclose any of its clients' confidential information to a third party, except:

- (a) to the extent that it is required to do so pursuant to any applicable laws, rules and/or regulations; and/or
- (b) if there is a duty to the public to disclose; and/or
- (c) if our legitimate business interests require disclosure; and/or
- (d) at your request or with your consent or to persons described in this Policy. The Company will endeavor to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

7. How we obtain your consent

Where our use of your personal information requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s) as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

By submitting any personal information (including, without limitation, your account details) to us, you consent to the use of information as set out in this Policy. We reserve the right to amend or modify this Policy and if we do so, we will post the changes on the Website. It is your responsibility to check the Policy when you submit information to us. Your use of the Website will signify that you agree to any such changes.

If we rely on your consent as our legal basis for holding and processing your personal information, you have the right to withdraw that consent at any time by contacting us, using the contact details set out in this Policy.

8. Storage of your personal information and retention period

Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time. For example, we are subject to certain Anti-Money laundering laws which require us to retain the following, for a period of seven (7) years after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer due diligence obligations;
- supporting evidence and records of transactions with you and your relationship with us.



Also, the personal information we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e. 7 years after our business relationship with you has ended). Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

9. Amendments

We may, at any time and at our discretion, vary this Policy. We will notify you, if we amend this Privacy Policy, by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change.

10. How to contact us

If you have any questions regarding this Policy, wish to access or change your information, or if you have any questions about security on our website, you may email us at info@fintana.com.

If you have a concern about any aspect of our privacy practices, you can submit a complaint. This will be acted upon promptly. To make a complaint, please contact us via email at complaints@fintana.com



Fintana

Cosmos Sol Capital LTD is authorised and regulated by the Financial Services Commission (FSC) of Mauritius with license number: GB23201338. Cosmos Sol Capital's registration number is 197666

Registered Address: 6th Floor, Tower 1, Nexteracom Building, Ebene, Mauritius

Website: fintana.com

Email: info@fintana.com

