Privacy Policy

1. General Provisions

- 1.1. This Privacy Policy describes the policies and procedures of Ebinex LLC regarding the collection, use, and disclosure of Client information (including personal data) when using Ebinex LLC's Trading Platform via the website ebinex.com (the "Site"). It also informs Clients about their privacy rights and how the law protects them.
- 1.2. This Privacy Policy is an integral part of the Ebinex LLC Client Agreement.
- 1.3. The information provided by the Client is collected and processed by Ebinex LLC, a company registered under the laws of Saint Vincent and the Grenadines, registration number 3195 LLC 2024, located at Euro House, Richmond Hill Road, Kingstown, Saint Vincent and the Grenadines (hereinafter referred to as the "Company," "We," or "Our"), providing access to Ebinex LLC's Trading Platform.
- 1.4. We take all necessary measures to ensure the confidentiality of the personal data provided by the Client.
- 1.5. We recommend that Clients read this Privacy Policy carefully. By registering on the Site, the Client fully and unconditionally agrees to the terms of this document.

2. Terminology

- 2.1. Capitalized words have defined meanings according to the following definitions, which remain the same whether they appear in singular or plural form:
 - 'Cookies' are small files placed on the Client's computer, mobile device, or any other device by a website, containing details of browsing history.
 - 'Client' means the individual accessing or using the Trading Platform.

Other terms are interpreted in accordance with the Ebinex LLC Client Agreement.

3. Cookie Policy

- 3.1. Like most websites, we use cookies. Some cookies are essential for the operation of the Site and are used without additional Client permission. These include:
- a) Cookies identifying the source from which the transition to the Site was made;
- b) Cookies containing the Client's session ID on the Site.
- 3.2. We also collect and process data about the Client's device, including IP address, browser type, browser version, and configuration.
- 3.3. When registering on the Site, we ask the Client to provide their email address. If the Client chooses to register using their email, they will provide us with access to their name, email address, language preference, and profile picture ("user data").

- 3.4. If the Client registers and logs in using their Google or Facebook account, we also collect authorization data (technical data regarding login/logout via those accounts).
- 3.5. When funding a Trading Platform Account, the Client provides us with payment data, including card number, expiration date, CVC/CVV code, financial institution/issuer details, and other data, depending on the payment method, as well as name, ID/passport number, address, phone number, date of birth, and email address.
- 3.6. Our partners (financial institutions and Payment System Providers) receive and process Client payment information for deposits. Upon request by the payment system or Provider, we may also provide ID/passport data, email, and phone number if available in the Client's Personal Account.
- 3.7. Payment System Providers process this data while the Client uses our services and delete it once processing goals are met unless the law requires longer storage.
- 3.8. As part of verification, we may request:
 - a photo of passport or ID;
 - a selfie holding the document;
 - proof of address;
 - additional supporting documents;
 - completion of the KYC form.

We may request documents proving the origin of Client's funds/assets (e.g., salary agreement, property sale, loan agreement, inheritance proof, income tax return, service contract, company invoices); and a second ID.

- 3.9. We collect and store data on Client financial activity and other actions on the Trading Platform, as well as server logs (including interface language, browser type, and last visit date/time).
- 3.10. If the Client wins a promotion, we may request their full name, address, and phone number to send the prize.
- 3.11. Occasionally, we may ask Clients to complete surveys to improve service quality, for statistical purposes, or to comply with applicable laws.
- 3.12. When contacting our Support Service, the Client must provide their name, surname, and email.
- 3.13. To comply with AML laws and KYC requirements, we may request additional data including income sources.
- 3.14. We process personal data only:
- i) when necessary to fulfill a service contract (Client Agreement);
- ii) when the Client consents, including through accepting the Client Agreement and Privacy Policy;
- iii) when required by law; or
- iv) when in our legitimate interest, while balancing with Client confidentiality.

Failure to provide required data may prevent us from delivering services.

4. How We Use the Information Provided by the Client

- 4.1. The information we receive allows us to deliver quality services, improve existing services, and create new ones.
- 4.2. Data obtained via cookies and similar tools ensures Site functionality and improves service quality.
- 4.3. Data collected during Site visits is necessary for Trading Platform operation and analysis, and to provide information conveniently (e.g., appropriate language, account currency).
- 4.4. Registration and verification data (including name, surname, gender, DOB, nationality, email, Google or Facebook data if applicable) is used to contact the Client and personalize communication.
- 4.5. To improve convenience, we retain the data provided when depositing funds and auto-fill it on future deposits (except card number, expiration, CVV, and security details).
- 4.6. Financial activity and server data is used to protect Client funds and prevent fraud.
- 4.7. Client contact data may be used to send system notifications and marketing materials via calls, SMS, or other permitted means. Clients may unsubscribe via the "Unsubscribe" link in emails, in their Personal Account, or by contacting Support.
- 4.8. We may notify Clients of operational or service changes by email.
- 4.9. Client data may be used to personalize Site content and serve relevant ads.
- 4.10. Information provided during Client support requests helps us respond accurately and quickly.

We will always seek consent for new data uses. Automated processing of personal data will not affect the Client.

5. Retention of Client's Personal Data

We retain Client data only as long as necessary to fulfill the purposes outlined in this Policy, comply with legal obligations, resolve disputes, and enforce agreements.

6. Client Rights

- 6.1. Clients have the following rights:
- a) Access receive a copy of personal data we hold;
- b) Correction request correction of incomplete or inaccurate data;
- c) Deletion request data deletion where processing is no longer necessary;

- d) Restriction or Objection request suspension of data processing;
- e) Withdrawal of consent without affecting legality of previous processing.
- 6.2. These rights may be limited by AML and KYC laws.
- 6.3. Exercising these rights may lead to service termination in some cases.

7. Transfer of Client's Personal Data

- 7.1. Client data may be transferred to computers in jurisdictions with different data protection laws.
- 7.2. Client consent to this Policy implies agreement to such transfer.
- 7.3. We ensure secure processing of personal data during such transfers with proper safeguards.

8. Disclosure of Client's Personal Data

- 8.1. Client data may be disclosed for:
- a) Business transactions (e.g., mergers/acquisitions);
- b) Law enforcement (as legally required);
- c) Other legal needs (to comply with obligations, defend rights, ensure personal safety, etc.).

9. Information We Share with Third Parties

- 9.1. We may share data with:
- a) Service Providers maintaining IT systems, payments, analytics, customer support, etc.;
- b) Related entities/affiliates for service delivery;
- c) Government authorities as legally required;
- d) Other cases to protect our rights or in response to legal claims.
- 9.2. We ensure third parties sign confidentiality and data protection agreements.

10. Protection of Technical Information

- 10.1. We implement specific rules and technical measures to protect Client data.
- 10.2. SSL encryption is used for transmitted data.

11. Passwords

11.1. The Client sets their password upon registration.

11.2. We do not alter or access these credentials.

11.3. Clients should report unauthorized use immediately.

12. Use of Our Services by Minors

12.1. The Site is not intended for minors under applicable law.

12.2. If a minor registers, their data will be deleted upon discovery.

13. Changes

13.1. We may update this Policy, but never in a way that reduces Client rights under the

law.

13.2. Changes take effect upon publication unless otherwise stated. Clients will be

notified by email.

13.3. Clients not agreeing to changes should stop using the Site and withdraw funds.

13.4. In case of discrepancies between language versions, the English version prevails.

14. Contacts

For questions or to revoke consent for data processing, contact us at:

suporte@ebinex.com

Updated: 05/08/2025