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StarLight Wave Ltd (hereinafter referred to as the “Company”), is a company registered with the registrar of International Business Companies in Saint Lucia with registration No. 2023-00491.

1. Definitions

“**correct**” in relation to personal information, means to alter that information by way of correction, deletion, or addition; and “**correction**” has a corresponding meaning;

“**data**” includes representations of facts, information or concepts that are being prepared or have been prepared in a form suitable for use in an electronic system including a computer program, text, image, sound, video and information within a database or electronic system;

“**data subject**” means the natural person who is the subject of personal data;

“**document(s)**” means: -

- (a) Any medium in which information is recorded, whether printed or on tape or film or by electronic means or otherwise; and
- (b) Includes any map, diagram, photograph, film, microfilm, video-tape, sound recording, or machine readable record or any record which is being produced by a machine-readable record by means of equipment or a program, or a combination of both, which is used for that purpose by the establishment which holds the record;

“**personal data**” means information about a data subject that is recorded in any form including-

- (a) Information relating to the race, national or ethnic origin, religion, age, sexual orientation, sexual life or marital status of the data subject;
- (b) Information relating to the education, medical, criminal, or employment history of the data subject or information relating to the financial transactions in which the individual has been involved or which refers to the data subject;
- (c) Any identifying number, symbol or other particular designated to the data subject;
- (d) The address, fingerprints, DNA, or blood type of the data subject;
- (e) The name of the data subject where it appears with other personal data relating to the data subject or where the disclosure of the name itself would reveal information about the data subject;
- (f) Correspondence sent to an establishment by the data subject that is explicitly or implicitly of a private or confidential nature, and replies to such correspondence that would reveal the contents of the original correspondence; or
- (g) The views or opinions of any other person about the data subject.

“**processing**” in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operations or set of operations on the information or data, including: -

- (a) Organization, adaptation or alteration of information or data;
- (b) Retrieval, consultation or use of the information or data;
- (c) Disclosure of the information or data by transmission, dissemination, or otherwise making available; or

(d) Alignment, combination, blocking, erasure or destruction of the information or data;

2. Our Commitment to You

To provide our services, we must collect and process certain personal data about you and your activities. We assure you that your personal data will be kept private, and we have implemented robust measures to protect the confidentiality, security, and integrity of your information. Please review the following information carefully.

3. Grounds for data collection

The processing of your personal data (i.e., any information that can potentially identify you; referred to as "Personal Information") is essential for fulfilling our contractual obligations to you, delivering our services, protecting our legitimate interests, and complying with legal and regulatory requirements.

By using our services, you consent to the collection, storage, use, disclosure, and other uses of your Personal Information as outlined in this Privacy Policy.

4. How do we receive personal data about you?

We collect your Personal Information from various sources:

1. When you voluntarily provide us your personal details in order to register for a trading account with the Company (e.g., your name and email address);
2. When you use and/or access our site and services, in connection with your use of our services (e.g., your financial transactions);
3. From third-party providers and services, such as credit reference agencies, fraud prevention agencies, identity verification vendors, banks, authentication service providers and public registers.

5. What type of information do we collect?

For the opening of a trading account with the Company and to provide you with our services we will need to collect the following information:

5.1 Personal Information

- **Registration information** – your full name, email address, phone number, occupation, country of residency, and your age to allow the Company to verify you are over 18 years of age and eligible to engage to 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.

5.2 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 as 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.

6. 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, 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.

7. How do we use the information we collect?

- 7.1 Provision of service - we will use your Personal Information you provide us with for the provision and improvement of our services to you.
- 7.2 Marketing purposes - we will use your Personal Information (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. 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, building an automated profile based on your Personal Information, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the "unsubscribe" link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications or reply to your queries and feedback you provide us.
- 7.3 Opt-out of receiving marketing materials - If you do not want us to use or share your personal information for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt out, we may still use and share your personal information with third parties for non-marketing purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your personal information are authorized to use your Personal Information only as necessary to provide these non-marketing services.
- 7.4 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 analyze the information we have to develop, evaluate and improve these features.
- 7.5 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 our rights and/or partners.

7.6 Enforcing of policies - we use your Personal Information in order to enforce our policies, including but limited to our Terms or Client Agreement.

7.7 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.

8 With whom do we share your personal information?

8.1 Internal concerned parties - we share your information with companies in our group, as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services.

8.2 Financial providers and payment processors - we share your financial information about you for the purposes of accepting deposits or performing risk analysis.

8.3 Business partners - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.

8.4 Legal and regulatory entities - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of Tomorrow Technologies LTD, its users and/or partners. We may also disclose your personal information that was requested by a supervisor or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker.

8.5 Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

9 How we protect your personal data

9.1. We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. Your information is stored on secure servers and isn't publicly available. We limit access to your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us.

9.2 You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

9.3 While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Information, we cannot ensure or warrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

10 Right to access personal data

10.1 You have the right to request access to your personal data, by providing in writing specifically what information is required and a reasonable purpose of your request to allow the Company adequate time to examine and assess your request.

10.2 You have the right to request the company to erase all your personal information, with which the company shall comply, unless there is a lawful reason for not doing so.

10.3 The Company reserves the right to inform you if an extended time frame may be required in order to comply with your request(s) as may be mutually agreed.

10.4 The Company reserves the right to refuse to provide any personal information of the Client to any third party related to the Client, unless the relevant authorization is provided by the Client and informing the Company thereof.

10.5 The Company reserves the right to impose processing fees, which will be determined at the Company's sole discretion, for the provision of personal data to the Client, depending on the workload required and resources used by the Company to comply with such request.

10.6 In the event that the Client will not comply with the abovementioned subsections, the Company has the right to refuse to provide any personal information to the Client or to any third party authorized by the Client, to make such requests.

11 Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications, and anything else as required by applicable laws and regulations.

HOW TO CONTACT US?

If you decide to terminate your account, you may do so by emailing us at support@emarlado.com. If you terminate your account, please be aware that personal information that you have provided us may still be maintained for legal and regulatory reasons (as described above), but it will no longer be accessible via your account.

12 Updates to this Policy

This Privacy Policy is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.