



CONFIDENTIALITY POLICY

UP GLOBAL MARKETS LTD

Licensed by the Financial Services Commission (FSC) Mauritius

License No. **GB25204570** – Investment Dealer (Full Service Dealer, Excluding Underwriting)

Registered Address: 4th Floor, Docks 4, The Docks, Caudan, Port Louis, Mauritius

Support Email: support@upforex.com

Version: 9th July 2025, **Version:** V1

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Support Email: support@upforex.com | Compliance Email: compliance@upforex.com
Support Contact: +971 52 609 0312 | *Version: 9th July 2025, Version: V1*

DEFINITIONS

- **“Company”** means UP Global Markets Ltd.
- **“FCPA 2022”** means the Financial Consumer Protection Act 2022 (Mauritius) as amended.
- **“FSC”** means the Financial Services Commission of Mauritius.
- **“Non-public consumer data”** means data provided by financial consumers that is not available to the public.

1. ABOUT UP GLOBAL MARKETS LTD

UP Global Markets Ltd is incorporated in Mauritius and licensed by the Financial Services Commission (FSC) as an Investment Dealer (Full Service Dealer, Excluding Underwriting).

2. APPLICABLE REGULATORY FRAMEWORK AND PURPOSE OF THIS POLICY

This Policy is adopted pursuant to the **Financial Consumer Protection Act 2022** of Mauritius.

Its purpose is to ensure protection of **non-public consumer data** by defining how the Company, its employees, and agents collect, store, process, use, and disclose information received from clients or potential clients.

This Policy complements the Company's **Privacy Policy, Client Agreement, General Terms, Partnership Agreement, and Bonus Terms**, all of which remain in effect.

3. NON-PUBLIC DATA COLLECTED AND PROCESSED

The Company may collect and process, without limitation:

- Personal details (name, address, contact information, date of birth, nationality, occupation).
- Economic profile data (source of income, source of wealth, risk tolerance).
- Politically Exposed Person (PEP) status.
- Banking/payment details.
- Identity verification documents (passports, IDs, utility bills, corporate incorporation documents).
- Any other information designated as confidential.

4. SENSITIVE DATA

The Company does not generally collect sensitive data (racial/ethnic origin, political views, union membership, health data, etc.).

If required, explicit consent and explanation of purpose will be obtained before collection.

5. PURPOSE OF DATA COLLECTION & USE

Non-public consumer data is used for:

- Performing contractual obligations and client services.
- Client due diligence (KYC/AML) and ongoing monitoring.
- Risk management and fraud prevention.
- Suitability and appropriateness assessments.
- Account administration and service improvements.

- Compliance with FSC and other legal obligations.
- Complaint resolution and post-termination record keeping (7 years).

6. SECURITY PRACTICES

The Company ensures the confidentiality, integrity, and security of data through:

- Access restrictions based on role/responsibility.
- Network and system-level protections.
- Encryption and access control.
- Confidentiality undertakings for employees and third parties.

Third-party service providers (e.g., liquidity providers, payment processors) are bound by confidentiality and use data only to perform contracted services.

7. COLLECTION AND PROCESSING OF DATA

7.1 Processing – Only authorized employees may process client data. Unauthorized access constitutes a serious policy breach and may result in disciplinary measures.

7.2 Data Protection Officer – The Company appoints a Data Protection Officer (DPO) to oversee compliance, liaise with regulators, and handle client complaints relating to data use.

7.3 Intended Recipients – Employees, authorized representatives, and third-party contractors engaged by the Company for service provision.

7.4 Client Rights – Clients may, at any time, request to:

- Review their non-public consumer data.
- Correct or amend inaccurate data.
- Restrict or terminate processing, subject to legal/regulatory requirements.

8. STORAGE OF DATA

- Data is stored securely on Company servers and cloud systems with backup procedures.
- Data is retained for at least **seven (7) years** after the last client transaction, or longer where required by law or regulatory investigations.

9. DISCLOSURE OF DATA

The Company may disclose data:

- a. With the client's written consent.
- b. To authorized third parties (e.g., payment processors, liquidity providers).
- c. Where required by law, court order, or FSC directives.

Voluntary Disclosure – By accepting this Policy and the Client Agreement, the client consents to data use and disclosure in line with this Policy.

10. CLIENT CONSENT

Clients provide consent electronically by accepting the Client Agreement and related policies. Consent extends to all processing necessary for service provision and regulatory compliance.

11. AMENDMENTS

The Company may amend this Policy at any time. Updates will be published on the Company's website. Continued use of services constitutes acceptance of amendments.

12. CONTACT

Clients may exercise their rights or raise concerns by contacting: **UP Global Markets Ltd**
Registered Address: 4th Floor, Docks 4, The Docks, Caudan, Port Louis, Mauritius or Email us at compliance@upforex.com | support@upforex.com

ACKNOWLEDGMENT

By maintaining an account with the Company, the Client acknowledges having read, understood, and accepted this Confidentiality Policy.