



# **HIGH CAPITAL MARKETS LTD**

## **Privacy Policy**

High Capital Markets Ltd is a company registered in Mauritius with Company Number: 183353 is regulated by the Financial Services Commission of Mauritius with License number: GB21026331.  
Registered Office: C/o Amicorp (Mauritius) Limited 6th Floor, Tower 1, Nexteracom Building Ebene



High Capital Markets Ltd is a registered Global Business Company (Company No. 183353) and is authorised and regulated by the Financial Services Commission (FSC) of Mauritius as an Investment Dealer (Full-Service Dealer, excluding Underwriting) (License number GB21026331).

## **1. Introduction**

Your privacy and trust are important to us and this Statement explains how we handle personal data in accordance with the Mauritian Data Protection Act 2017 (DP Act) and applicable data protection laws. We may make changes to this Statement from time to time, and it is important that you check this Statement for any updates. This Statement is governed by and construed in accordance with the laws of Mauritius

### **Consent Mechanisms and Lawful Basis for Processing**

The collection, use, storage, disclosure, right of access and correction of personal information by the GO Markets is governed by the Mauritian Data Protection Act 2017 (DP Act). Mauritian Data Protection Act 2017 sets out the rules for information matching and provides on how the personal information is treated. These principles reflect internationally accepted standards for personal information handling.

We are committed to complying with applicable Mauritian data protection laws and regulations, including:

- The Mauritian Data Protection Act 2017 (DP Act) and subsequent amendments
- Requirements of the Financial Services Commission of Mauritius (FSC)
- Guidelines issued by the Mauritius Data Protection Commissioner as a business operating in Mauritius
- Maintaining registration with the Mauritius Data Protection Commissioner
- Appoint a designated Data Protection Officer
- Conduct regular data protection impact assessments
- Implement appropriate technical and organizational measures
- Report data breaches within 72 hours to relevant authorities
- Obtain explicit consent for processing sensitive personal data
- Honor data subject access requests within 30 days
- Maintain detailed records of processing activities
- Ensure lawful cross-border data transfers through appropriate safeguards
- We regularly review and update our practices to maintain compliance with evolving Mauritius regulatory requirements. Our Data Protection Officer can be contacted at [finance@trendinex.com](mailto:finance@trendinex.com) for any compliance-related inquiries.

## 2. Cross-Border Data Transfers

We may transfer personal data to countries outside of Mauritius in accordance with applicable data protection laws. Such transfers will only occur where:

- Data Breach Notification Procedures require so
- In accordance with Mauritian data protection requirements, in the event of a data breach that is likely to result in a risk to the rights and freedoms of individuals, we will notify the Mauritius Data Protection Commissioner within 72 hours of becoming aware of the breach, providing details of:
  - The nature and scope of the breach
  - The categories and approximate number of individuals affected
  - The categories and approximate volume of personal data records involved
  - The likely consequences of the breach
  - The measures taken or proposed to address the breach and mitigate its effects

Moreover, we shall notify affected individuals without undue delay when the breach is likely to result in a high risk to their rights and freedoms, document all breaches, including the facts, effects, and remedial actions taken, conduct a post-breach review to prevent future occurrences, maintain an internal breach register recording all incidents and our response measures.

Furthermore, we have implemented a comprehensive incident response plan and designated personnel responsible for managing and reporting data breaches in compliance with regulatory requirements.

- The transfer is to a country that provides an adequate level of protection for personal data as determined by the Mauritius Data Protection Commissioner;
- The transfer is made subject to appropriate safeguards, such as standard contractual clauses approved by the Mauritius Data Protection Commissioner;
- The transfer is necessary for the performance of a contract between you and us, or for the implementation of pre-contractual measures taken at your request;
- You have explicitly consented to the proposed transfer after being informed of the possible risks; or
- The transfer is necessary for important reasons of public interest or for the establishment, exercise or defense of legal claims.

We will implement appropriate measures to ensure that your personal data remains protected and secure when transferred internationally, in accordance with applicable data protection laws and regulations.

- Subscribe to communications
- Accept cookies and tracking technologies
- Provide sensitive personal data
- Documented evidence of consent including:
  - Date and time of consent
  - Method of consent

- Information presented at time of consent
- Scope of consent given

You have the right to withdraw consent at any time by contacting us. Withdrawal of consent will not affect the lawfulness of processing based on consent before withdrawal. Where we rely on other lawful bases for processing your data under Mauritius law, we will inform you of the specific basis and purpose.

### **3. How we use personal data**

We collect, use, disclose, transfer and store personal data when needed to provide our services and for our operational and business purposes as described in this Statement. We want to be clear about our privacy practices, so you can make informed choices about the use of your personal data. You can contact us at any time with questions or concerns.

This information is collected from several sources, and may include information received from our clients:

- whether in writing;
- in person;
- by telephone;
- electronically; or
- on applications or other forms.

This information may include information about their transactions with us, our affiliates, and others which may consist of:

- information about account balances;
- counterparties to transactions;
- information we might receive from credit reporting companies such as credit reports; and
- information collected from the Internet.

### **4. Information We Disclose**

We do not sell any information about our clients. Only upon our clients' specific request will information such as name, income, and assets be shared with our related companies. From time to time and when we deem it necessary to facilitate the handling of our relationship with our clients, we will share appropriate information with third parties and partner companies as permitted by law. We only share information that is required for third parties to perform their job. For example, we may disclose information to third parties such as data processing providers and brokers when using them to execute orders.

### **5. Our legal obligations**

We may be required to retain and use personal data to meet our internal and external audit requirements, for data security purposes and as we believe to be necessary or appropriate:

- To comply with our obligations under applicable law and regulations, which may include laws and regulations outside your country of residence;
- To respond to requests from Courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
- To monitor compliance with and enforce our Platform terms and conditions;
- To carry out anti-money laundering, sanctions or Know Your Customer checks as required by applicable laws and regulations;
- To protect our rights, privacy, safety, property, or those of other persons; or
- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)

We may also be required to use and retain personal data after you have closed your account for legal, regulatory and compliance reasons, such as the prevention, detection or investigation of a crime; loss prevention; or fraud prevention.

## **6. Trade activity monitoring**

In order to meet our internal compliance and regulatory obligations under Mauritius law, we monitor your trading activity such as the frequency of your trading and number of trades, and monetary activity such as number of deposits/withdrawals, payment methods used, your device information and IP address. This monitoring is conducted in accordance with applicable Mauritius data protection requirements.

## **7. Obtaining a copy of your personal data and correcting mistakes**

We respect your right to access, control, rectify, erase and port your personal data in accordance with the Mauritius Data Protection Act. We will respond to requests for personal data within 30 days and, where applicable, will correct, amend, delete or provide a copy of your personal data in a structured, commonly used and machine-readable format.

### **7.1. Access to personal data**

We will give you access to your personal data (including a copy or the ability for us to send your personal data to another provider) on request within 30 days, unless any relevant legal requirements prevent us from doing so or other exemptions apply under the Mauritius Data Protection Act. Before providing access to you, we will ask you to prove your identity through official documentation and give us sufficient information about your interaction with us so that we can locate any relevant data. Access requests can be made by contacting us as set out in this Policy.

### **7.2. Correction and deletion**

You have the right to correct, amend or update your personal data if it is inaccurate, incomplete or requires updating. You may also have the right to request deletion of your personal data in accordance



with applicable Mauritius data protection laws. If you request deletion of your personal data, this will result in the automatic closure of your account, and we will remove your personal data from active processing. However, we will be required to maintain your personal data to comply with our legal and regulatory obligations under Mauritius law as well as in accordance with our internal compliance requirements in relation to maintaining records.

## **8. Security of Information**

We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. We maintain physical, electronic, and procedural safeguards to protect our clients' personal information and have strict internal policies against unauthorised use or disclosure of client information. Our clients' information is accessible only to employees who need it to provide services to the client. All of our employees are required to follow our data privacy and security policies when handling personal data and are reminded on a regular basis of their obligations with regard to the confidentiality of client information through employee training and by operating procedures.

## **9. Data retention**

We will retain your personal data for as long as necessary for the purposes for which it was collected and in accordance with Mauritius data protection laws and regulations, or for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into account local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it in compliance with applicable Mauritius data protection requirements.

## **10. Contacting us about this statement or making a complaint**

If you have any queries about the contents of this Statement, wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you, or would like to raise a complaint or comment, please contact us via email to [finance@trendinex.com](mailto:finance@trendinex.com).

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can escalate your complaint to the data protection regulator in your jurisdiction.

## **11. Governing Law and Jurisdiction**

This Privacy Statement and any dispute or claim arising out of or in connection with it or its subject matter shall be governed by and construed in accordance with the laws of the Republic of Mauritius. Any dispute arising from or in connection with this Privacy Statement shall be subject to the exclusive jurisdiction of the courts of Mauritius. You irrevocably agree to submit all disputes to the jurisdiction of the Mauritius courts. For data protection matters specifically, complaints may also be lodged with



the Mauritius Data Protection Commissioner in accordance with the Mauritian Data Protection Act 2017 (DP Act).

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