

PRIVACY POLICY

Privacy Policy

YOUR PRIVACY IS IMPORTANT TO US

1. Introduction

This website is provided by InnovateCorp LTD, a company registered in Marshall Islands, having its registered address situated at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands MH96960 and operating under the brand name Divitum Trade (www.divitumtrade.com) (hereinafter “We”, “Us”, or the “Company”)

We value our relationship with you and we are committed to ensuring that your personal data are kept safe and at all times. The provisions within this Privacy Policy (the “Policy”) apply to all visitors that receive the intended services through our website and/or systems (the “Services”).

It is important therefore that you read and understand this Policy together with any other privacy document and/ or notice we post on our website so that you are fully aware of how and why we are using your personal data.

2. Personal Information

In order to provide you with the very best service, when you apply to become a Divitum Trade customer or open a live account, we will ask you for personal information. This information will assist us in evaluating your financial needs, processing your requests and transactions, retrieving lost passwords, keeping you informed about products and services that may be of interest to you, and providing you with a better customer experience. We are also required by law to retain some records.

3. Required Information

May Include: Application Information – full name, address, birth date, identity or social security number, occupation, assets and income, and other similar information, as detailed on the application forms. Transaction Information – Information about your transactions with us and/or our affiliates, and records of past communications. These may include your account balances, trading activity, past inquiries and our responses. Verification Information – This may be required to verify your identity, and may include passport or driver’s license, utility bill, bank statement, credit card copy etc. Note: Anti-Money

Laundrying (“AML”) regulations require financial institutions to collect information and take action where necessary, in order to verify a customer’s identity.

4. The Use of Cookies

Divitum Trade also collects and uses information acquired from “cookies”. “Cookies” are bits of textual information that are sent electronically from a web server to your browser and are stored on your computer. They do not identify you individually nor do they contain personal information about you, unless you have identified yourself or provided the information by, for example, opening an account or registering for an on-line service. Divitum Trade may use cookies to measure and identify website traffic patterns and to track the performance of web features and advertisements. By providing Divitum Trade with a better understanding of how you and others use Broker’s websites and other web services, cookies enable Divitum Trade to improve the navigation and functionality of its websites and to present the most useful information and offers to you. Divitum Trade may share information obtained from cookies with its employees, agents and affiliates, but does not sell such information to unaffiliated third parties. Divitum Trade may permit other companies or their third-party ad servers to set their own cookies on your browser when you visit Divitum Trade website. Such companies generally use these cookies as we do, but you should refer to their privacy policies in case of any doubt. In any case and in any time, you can manage cookies from your internet browser.

5. Sharing Information:

A. Affiliates

We may share some or all of the personal information described above with our affiliates in order to service client accounts or inform clients of new products and services. Our affiliates may include companies controlled or owned by us, as well as companies which have an ownership interest in our company. Our affiliates will maintain the privacy of your information in the same manner and to the same extent as Divitum Trade, and in accordance with this privacy policy.

B. Third Parties

Divitum Trade does not disclose your personal information to third parties, except as described in this privacy policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with Divitum Trade. These companies may include those that provide professional, legal or accounting services to Divitum Trade. Non-affiliate

companies that assist Divitum Trade in providing services are required to maintain the confidentiality of such information to the extent they receive it. In addition, they are obligated to use your personal information only in the course of providing such services and only for the purposes dictated by Divitum Trade. Divitum Trade may disclose a customer's personal information to a third party in order to fulfill their instructions or pursuant to express consent. It is important to us that you know that Divitum Trade will not sell your personal information.

C. Regulators

Divitum Trade may disclose your personal information to third parties as permitted by, or in order to comply with applicable laws and regulations. This may include disclosing personal information in order to cooperate with regulatory authorities and law enforcement agencies, as may be necessary to protect our property or rights.

D. Merger or Bankruptcy

In the event of a merger of Divitum Trade, the company's customer information will merge along with the company. In the event of bankruptcy, different legal statuses shall apply in accordance with its incorporation laws and its record keeping requirements.

E. Payment Information

Divitum Trade does not keep, in any form, customer's credit card information.

6. Failure to Provide Personal Information, Opt Out and Retention Period

A. You have a choice to supply any or all of the personal information required. However, please note that missing information may result in us being unable to open or maintain your account and /or to provide you with our services.

B. Should you choose to have your name and personal data removed from our database, you can do so by sending an email to customer.service@divitumtrade.com, but kindly note that missing information may result in our being unable to open or maintain your account and /or to provide you with our services.

C. Clients data is retained for 7 (seven) years after they cease to be a client.

7. Amendments

Any amendments to our privacy policy that affect the personal information of users collected on our website will be notified to the users, within a reasonable time, via email. Users will have a choice whether or not we use the information in a different manner. Any

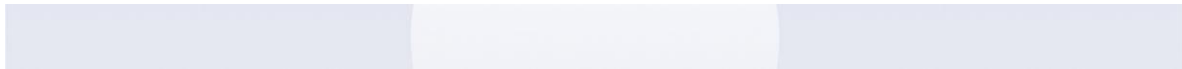
amendments made by us that do not affect personal information will be posted on our website.

8. Mailing Information

Whether you wish to talk to us about our privacy policy or any other issue, the professional team at Divitum Trade is available to assist you 24/7. Please feel free to contact us via e-mail or phone.

Company registered address: Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands MH96960

E-mail: customer.service@divitumtrade.com



AML POLICY

ANTI MONEY-LAUNDERING (AML) POLICY

The objective of KNOW YOUR CUSTOMER (KYC) guidelines is to prevent banks from being used, intentionally or unintentionally, by criminal elements for money laundering activities.

KYC procedures also enable banks to know/understand their customers and their financial dealings better, which in turn, help them to manage their risks prudently. Financial institutions need to implement effective 'Know-Your-Customer' (KYC) standards as an essential part of risk management practices.

A key challenge in implementing sound KYC policies and procedures is how to put in place an effective approach.

The legal and reputational risks are global in nature and as such, it is essential that each financial institution develop a global risk management program supported by policies that incorporate KYC standards.

It is important that the adoption of customer acceptance policy and its implementation should not become too restrictive and must not result in denial of services to general public especially to those who are financially or socially disadvantaged.

The term 'money laundering activities' cover not only the criminals who try to launder their ill-gotten gains, but also the bank/financial institutions and their employees who

participate in their transactions and have knowledge that the property is criminally derived. "Knowledge" includes the concept of conscious avoidance of knowledge.

Definition of a Customer For the purpose of KYC policy, a customer may be defined as: - A person or entity that maintains an account and/or has a business relationship with InnovateCorp Ltd. - On whose behalf the account is maintained (i.e. the beneficial owner).

- Beneficiaries of transactions conducted by professional intermediaries, such as stock brokers, chartered accountants, solicitors etc. as permitted under the Law. - Any person or entity connected with a financial transaction, which can pose significant reputation or any other risks to InnovateCorp Ltd, for example, a wire transfer or issue of high value demand draft as a single transaction. KYC policy includes the following eight key elements:

1. Customer Identification Procedures

2. Monitoring of Transactions

3. Risk Management

4. Training Program

5. Internal Control System

6. Record Keeping

7. Evaluations of KYC guidelines by internal audit and inspection system; and

8. Duties / responsibilities and accountability Indicative Guidelines Accounts of companies and firms InnovateCorp Ltd's Compliance Department needs to be vigilant against business entities being used by individuals as a front for maintaining accounts with banks.

InnovateCorp Ltd's may examine the control structure of the entity, determine the source of funds and identify the natural persons who have controlling interest and who comprise the management.

These requirements may be moderated according to the risk perception e.g. in the case of a public company it will not be necessary to identify all the shareholders. Customer Identification Procedure (CIP) CIP can only be carried out, inter alia, on the following stages: - While establishing the relationship; - While carrying out a financial transaction; - When InnovateCorp Ltd has a doubt about the authenticity/veracity or the adequacy of the previously obtained customer identification data. Customer identification means identifying the customer and verifying his/her identity by using reliable, independent source documents, data or information. InnovateCorp Ltd needs to obtain sufficient information necessary to establish, to its satisfaction, the identity of each new customer,

whether regular or occasional, and the purpose of the intended nature of business relationship.

Being satisfied means that InnovateCorp Ltd must be able to satisfy the competent authorities that due diligence was observed based on the risk profile of the customer in compliance with the extant guidelines in place.

Risk Assessment An effective KYC program should be put in place by establishing appropriate procedure and ensuring their effective implementation. It should cover proper management oversight, systems and controls, segregation of duties, training and other related matters.

Responsibility should be explicitly allocated within the company for ensuring that the company's policies and procedures are implemented effectively. The nature and extent of due diligence will depend on the risk perceived by InnovateCorp Ltd.

Customer profile will be a confidential document and details contained therein shall not be divulged for cross selling or any other purpose. InnovateCorp Ltd's internal audit and compliance have an important role in evaluating and ensuring adherence to the KYC policies and procedures.

The compliance function should provide an independent evaluation of the InnovateCorp Ltd's own policies and procedures, including legal and regulatory requirements. It should be ensured that the audit machinery is staffed adequately with individuals who are well versed in such policies and procedures.

Internal inspectors should specifically check and verify the application of KYC procedures at the branched/offices and comment on the lapses observed in this regard. Specially Designated Nationals and Sanctioned Parties Screening All customers are to be screened through various independent risk intelligence databases.

Customer identification Natural persons For customers that are natural persons, InnovateCorp Ltd should obtain sufficient identification (passport, ID, government identification, etc.) data to verify the identity of the customer, his address/location (utility bill, bank statement, etc.) as well as his recent photograph (if possible).

Legal persons For customers that are legal persons or entities, InnovateCorp Ltd should verify the legal status of the legal person/entity through proper and relevant documents, verify that any person purporting to act on behalf of the legal person/entity is so authorized and, identify and verify the identity of that person.

InnovateCorp Ltd should understand the ownership and control structure of the customer and determine who are the natural persons who ultimately control the legal person. If

InnovateCorp Ltd decides to accept such accounts, in terms of the customer acceptance policy, it should take reasonable measures to identify who the beneficial owner(s) is/are.

For new accounts: KYC procedure should be the key principle for identification of an individual/corporate account.

The customer identification should entail verification through an introductory reference from an existing account holder/ a person known to the bank or on the basis of documents provided by the customer. Recordkeeping All identification documentation and services records shall be kept for a minimum period of no less than 7 years. Training All new employees shall receive anti-money laundering training as part of the mandatory new-hire training program. All applicable employees are also required to complete AML training annually.

Participation in additional targeted training programs is required for all employees with day to day AML responsibilities.

Administration For the purposes of this AML Policy, InnovateCorp Ltd shall appoint an AML Compliance Officer. InnovateCorp Ltd's AML Compliance Officer shall be responsible for the administration, revision, interpretation, and application of this Policy.

The AML Policy will be reviewed annually and revised as needed. The duties of the AML Compliance Officer with respect to the AML Policy shall include, but shall not be limited to, the design and implementation of, as well as, updating the Policy as required; training of officers and employees; monitoring the compliance of InnovateCorp Ltd affiliates, maintaining necessary and appropriate records; and independent testing of the operation of the Policy.