

# GROWUP CAPITALS

**Privacy**  
Policy



# PRIVACY POLICY

## 1. INTRODUCTION

**1.1.** Company obtains and collects general information from the Client upon his/her registration for verification procedures including documentation of personal information.

**1.2.** While the Company may collect and store information, data and other recordings in relation to its business, the Company is not obligated to provide any of its record information to the Client and/or any third party.

## 2. COMPLIANCE

**2.1.** The Company may disclose the information and record of the Client to authorized third parties or if it deems obligatory. All collected information and documentation are confidential and will not be sold, leased, publicized. The Company complies with strict privacy measures to protect the information of the Clients.

**2.2.** If the Client intends obtain any information of another Client, he/she must send the request with a valid and clarified explanation via email subject to the approval of the Company. The Company reserves the right to refuse and reject any request regarding the provision of any corresponding recorded information.

**2.3.** While all information and documentations are confidential, the Company may still disclose all or some information of the Client to third-party affiliates or if deemed necessary. Information may be disclosed if, but not limited to, it mandatory in compliance with a legal obligation; if necessary to protect and defend the Company's workforce, properties, and Clients; and/or if such information is required to evaluate or investigate suspicious trading and financial activities.

**2.4.** Particular software and systems are used by the Company to secure all procedures and activities conducted within its property. The encrypted technology Secure Socket Layer ("SSL") is used and additional security measures are imposed to protect the information collected through the official website.

**2.5.** Regardless of the strict privacy and safety measures taken by the Company, the Client acknowledges that he/she should not expect that his/her information will be private at all times.

**2.6.** The Company uses cookies, which are files that allow the website to see how the Client navigates the web pages and accesses the websites. Information stored in cookies will remain private and will not be distributed to any third party or affiliates unless deemed obligatory.

**2.7.** The Client may block cookies using the web browser he/she is using. However, some website functions may not work accordingly. By continuing to use the website, the Client acknowledges and agrees with the Company's usage of cookies.