

# Savita Global Trading Ltd Privacy Policy

*Updated 5th June 2022*

## **1. Introduction**

*As part of Savita daily business operations, Savita collect personal information from her clients and prospective clients in order to provide them with our products and services, and ensure that we can meet their needs when providing these products and services, as well as when providing them with any respective information.*

**Your privacy is of utmost importance to Savita Global Trading Ltd, and it is our policy to safeguard and respect the confidentiality of information and the privacy of individuals. This Privacy Notice sets out how Savita API products and services provided by Savita Global Trading Ltd .; its affiliates and subsidiaries (collectively, the Savita Entities “Savita”, “the Company”, “We”, “Us”, and the trading and direct sales services provided by Savita (collectively the “Savita Global Exchange” or “Exchange”), collects, uses and manages the personal information we receive from you, or a third party, in connection with our provision of services to you or which we collect from your use of our services and/or our website. The Privacy Notice also informs you of your rights with respect to the processing of your personal information.**

Our Privacy Notice is reviewed regularly to ensure that any new obligations and technologies, as well as any changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. Any personal information we hold will be governed by our most recent Privacy Notice.

***Please note that if you are an employee of the Company, a contractor to the Company or a third-party provider, your personal information will be used in connection with your employment contract or your contractual relationship, whichever applies.***

This Privacy Notice applies to the processing activities performed by Savita to the personal information of its clients and its potential clients and website visitors.

***We may amend this Privacy Notice at any time by posting the amended version on this site including the effective date of the amended version. We will announce any material***

2. (a) As used herein, the following terms are defined as follows:

2. (a. 1) “Digital Asset” is a digital representation of value (also referred to as “cryptocurrency,” “virtual currency,” “digital currency,” “crypto token,” “crypto asset,” or “digital commodity”), such as Bitcoin BTC, Ripple XRP, Binance Coin BNB or Ethereum ETH , which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or open-source, and (iii) used as a medium of exchange and/or store of value.

2.(a.2) “Savita Account” means a user-accessible account offered via the Savita Exchange Services where Digital Assets are stored On Savita Hardwallet.

2. (a.3) “Savita Global Exchange Services” means Savita -branded websites, applications, services, or tools operated by Savita Global Trading Ltd.

2.(a.4) “We,” and “Us” refers to Savita Exchange.

2.(a.5) “Personal Information” or “Personal Data” or “your data” refers to any information relating to you, as an identified or identifiable natural person, including your name, an identification number, location data, or an online identifier or to one or more factors specific to the physical, economic, cultural or social identity of you as a natural person.

### **3. Your Data Controller**

Our products and services are provided through local operating entities that are subsidiaries of Savita Global Trading Ltd.

You are contracting with Savita Global Trading Ltd , as follows:

If you reside in Nigeria, you are contracting Directly with Savita Global Trading Ltd No 4 Life Forte Port Harcourt Nigeria.

If you reside in the rest of the world, you are contracting with Savita Global Trading Ltd in No 4 Life Forte Port Harcourt. Nigeria.

The Company you are contracting with is your Data Controller, and is responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our global privacy standards, this Privacy Notice, as well as any applicable national laws. The Company uses encryption to protect your information and store decryption keys in separate systems. We process and retain your

### **3 (a). How do we protect personal information?**

The Company "Savita Global Trading Ltd" respects the privacy of any users who access its website, and it is therefore committed to taking all reasonable steps to safeguard any existing or prospective clients, applicants and website visitors.

The Company "Savita Global Trading Ltd" keeps any personal data of its clients and its potential clients in accordance with the applicable privacy and data protection laws and regulations.

We have the necessary and appropriate technical and organisational measures and procedures in place to ensure that your information remains secure at all times. We regularly train and raise awareness for all our employees to the importance of maintaining, safeguarding and respecting your personal information and privacy. We regard breaches of individuals' privacy very seriously and will impose appropriate disciplinary measures, including dismissal from employment. "Savita Global Trading Ltd" have also appointed a Group Data Protection Officer, to ensure that our Company manages and processes your personal information in compliance with the applicable privacy and data protection laws and regulations, and in accordance with this Privacy Notice.

The personal information that you provide us with when applying to open an account, applying for a role within the Company, or when using our website, is classified as registered information, which is protected in several ways. You can access your registered information after logging in to your account by entering your username and the password that you have selected. It is your responsibility to make sure that your password is only known to you and not disclosed to anyone else (Note: Savita Workers, Savita Developers and Savita Exchange Cannot Access your password, It is Your Responsibility to make sure that your Password is Safeguard, remembered by you at all time you want to access your account, if you forgot your password you can recover your password with your registered email address if you still have access to your email address) . Registered information is securely stored in a safe location, and only authorised personnel have access to it via a usernames, Email, Address and Other KYC Informations. All personal information is transferred to the Company over a secure connection, and thus all reasonable measures are taken to prevent unauthorised parties from viewing any such information. Personal information provided to the Company that does not classify as registered information is also kept in a safe environment and accessible by authorised personnel only through usernames, Email addresses and other KYC informations. , .

### **3 (b) Information we may collect about you**

information in order to enable the Company to assess your application and comply with the relevant laws (including their regulations).

The First information that we collect from you is as follows:

Username, Phone Number, Email address & Password (Highly Secured) .

**3 (c) The information that we collect from you on KYC is as follows:**

Full name, residential address and contact details (e.g. email address, telephone number, fax etc.);

Date of birth, place of birth, gender, Nationality, Country Of Residence;

Bank account information, Bank Account Number, Bank Name, Bank Swift Code, Branch Code , excluding details about your source of funds, assets and liabilities, and OFAC information;

Verification information, which includes information necessary to verify your identity such as a passport, driver's licence or Government-issued identity card);

Other Personal Information or commercial and/or identification information – Whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various anti-money laundering (AML) obligations.

**3 (d) Informations we collect about you automatically.**

Browser Information – Information that is automatically collected via analytics systems providers from your browser, including your IP address and/or domain name and any external page that referred you to us, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;

Log Information – Information that is generated by your use of Savita Exchange Services that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;

**3 (e) Information we receive about you from other sources.**

We obtain information about you in a number of ways through your use of our services, including through any of our websites, the account opening process, webinar sign-up forms, event subscribing,

providers and through publicly available sources. For example:

The banks you use to transfer money to Your Fellow P2P Trader will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;

Your business partners, may provide us with your name and address, as well as financial information;

Advertising networks, analytics providers and search information providers may provide us with anonymized or de-identified information about you, such as confirming how you found our website;

Bank reference agencies do not provide us with any personal information about you, but may be used to corroborate the information you have provided to us.

## ***4. Transfers of Personal Information outside of your country***

By using our products and services, you consent to your Personal Data being transferred to other countries, including countries that have differing levels of privacy and data protection laws than your country. In all such transfers, we will protect your personal information as described in this Privacy Notice, and ensure that appropriate information sharing contractual agreements are in place.

### **4 (a) Privacy when using digital assets and blockchains**

Your funding of bitcoin, XRP, ether, and other Digital Assets, may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by Savita or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

### **4 (b) Data Retention**

Safeguarding the privacy of your personal information is of utmost importance to us, whether you interact with us personally, by phone, by email, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in secure computer storage facilities, and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

However, we may need to maintain records for a significant period of time (after you cease being our client). For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of 10 years after our business relationship with you has ended.

A copy of the records we used in order to comply with our client due diligence obligations;

Supporting evidence and records of transactions with you and your relationship with us.

Also, the personal information we hold in the form of a recorded information, by telephone, electronically or otherwise, will be held in line with local regulatory requirements (i.e. 10 years after our business relationship with you has ended or longer if you have legitimate interests (such as handling a dispute with you)). If you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory, or technical reasons.

#### **4 (c) Cookies**

When you use our products and services, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used when engaging with us. We use Cookies to (i) help us recognize you as a customer, collect information about your use of our products and services, to better customize our services and content for you, and to collect information about your computer or other access devices to ensure our compliance with our BSA and AML obligations.

#### **4 (d) Newsletter**

By [Signing up](#) on Savita you agree that Savita will send you newsletters & marketing emails which may include crypto prices, new listings, new features, crypto related news, predictions & market updates.

### ***5. Your rights regarding your personal information***

***The rights that are available to you in relation to the personal information we hold about you are outlined below.***

#### **5. (a) Information Access**

If you ask us, we will confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that information within 30 days from the date of your request.

make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them directly.

You may inform us at any time that your personal details have changed by emailing us at [support@savitaglobal.com](mailto:support@savitaglobal.com). The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof i.e. personal information that we are required to keep for regulatory or other legal purposes.

#### **5. (c) Erasure**

You can ask us to delete or remove your personal information in certain circumstances such as if we no longer need it, provided that we have no legal obligation to retain that data. Such requests will be subject to the contract that you have with us, and to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal information to others, we will let them know about the erasure request where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them direct.

#### **5. (d) Processing restrictions**

You can ask us to block or suppress the processing of your personal information in certain circumstances such as if you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information. We will inform you before we decide not to agree with any requested restriction. If we have disclosed your personal information to others, we will let them know about the restriction of processing if possible. If you ask us, if possible and lawful to do so, we will also inform with whom we have shared your personal information so that you can contact them direct.

#### **5. (e) Data portability**

In certain circumstances you might have the right, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

#### **5. (f) Objection**