

PROVIDENCE INVESTMENTS

NOVEMBER 2025

Providence Investments

PRIVACY POLICY

Company No 228292 | Licence No GB25205262

PROVIDENCE INVESTMENTS

1. Introduction

- 1.1. This Privacy Policy outlines how Providence Investments (referred to as the "controller," "we," "our," or "us"), a company regulated by the Financial Services Commission, Mauritius, in accordance with Section 29 of the Securities Act 2005 and Rule 4 of the Securities (Licensing) Rule 2007, gathers, utilizes, shares, and transfers personal information provided to us. The term "Personal Data" refers to any information that relates to an identified or identifiable individual (collectively referred to as "users," "data subject," "your," or "you").
- 1.2. Providence Investments provides services to clients across multiple jurisdictions, thereby subjecting us to the data protection laws in Mauritius as well as, in certain cases, the data protection laws and regulations of other countries when handling information of foreign citizens.
- 1.3. This Privacy Policy should be read alongside any other legal notices or terms and conditions that may be present on various sections of our website. Except where alternative terms (such as those in a Client Agreement) apply, the collection, use, distribution, and management of personal information will be governed by this policy.
- 1.4. If you have any inquiries, please reach out to our Data Protection Officer.

2. Definitions

- 2.1. **"Controller"** refers to an individual or public authority that, independently or together with others, defines the purposes and ways of processing personal data and holds decision-making authority regarding such processing.
- 2.2. **"Consent"** indicates any voluntary, specific, informed, and unequivocal expression of agreement by the data subject, shown through a statement or clear affirmative action, authorizing the processing of personal data related to them.

PROVIDENCE INVESTMENTS

- 2.3. **“Data Subject”** pertains to an identifiable or identified individual (referred to here as “users,” “your,” or “you”), particularly through identifiers such as a name, ID number, location data, online identifier, or one or more attributes specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.
 - 2.4. **“Personal Data”** includes any data linked to a data subject.
 - 2.5. **“Processing”** encompasses any action or collection of actions performed on personal data or data sets, whether by automated means or otherwise, such as collection, recording, structuring, storage, adjustment, retrieval, consultation, usage, transmission, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.
 - 2.6. **“Processor”** designates a person or public body processing personal data on behalf of a controller.
 - 2.7. **“Third Party”** refers to any person or public authority other than the data subject, controller, processor, or any individual who, under the direct authority of the controller or processor, is authorized to handle personal data.
 3. **Categories of Personal Data Collected and Held**
 - 3.1. We collect and manage different types of Personal Data related to you, as detailed below.
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PROVIDENCE INVESTMENTS

Purpose	Data categories	Legal Grounds
Provision of services, including account management	All categories of data except audio, video, location, marketing, communication, compliance, usage, and technical data	Contract
Provision of support services, including notifications about potential legally significant outcomes	Identity information, contact information, and profile information	Contract
Handling user complaints and resolutions	Depending on the nature of the request, this may include identity, contact, profile, financial, transaction and purchase history, payment, economic profile, and KYC data	Contract
Manage transactions (deposits, withdrawals, etc.)	Identity, contact, financial, transaction and purchase history, payment, and economic profile data	Contract
Conducting KYC/AML verifications and transaction monitoring	Identity, contact, economic profile, KYC, sensitive data (special categories), compliance, and location data	Legal obligation
Sharing information on suspected financial crimes, fraud, and threats with authorities	Identity, contact, economic profile, KYC, sensitive data (special categories), compliance, transaction and purchase history, and profile data	Legal obligation
Fraud prevention	All data except audio, video, location, marketing, communication, and compliance	Legitimate interest

PROVIDENCE INVESTMENTS

	data	
Defending against legal actions and claims	All data except audio, video, location, marketing, communication, and compliance data	Legitimate interest
Conducting statistical analysis	Profile, technical, and usage data	Legitimate interest
Informing users about service updates	Identity and contact data	Legitimate interest
Enhancing product support services	Identity, contact, and profile data	Legitimate interest
Improving application and website functionality	Usage and technical data	Legitimate interest
Marketing and product analytics	Contact, technical, usage, and profile data	Legitimate interest
Ensuring service security and protecting user data from unauthorized access	All data categories	Legitimate interest
Customization of our services	Profile, usage, and technical data	Legitimate interest
Direct marketing (including promotional events and activities)	Identity, contact, marketing, and communication data	Legitimate interest
Launching targeted advertising	Marketing and communication data	Consent
Affiliate program	Identity and transaction data, including purchase history	Consent

3.2. You agree to allow the transfer of your Personal Data to third parties as outlined in section 6.3 of this Privacy Policy and for purposes such as initiating targeted advertising and supporting the affiliate program.

PROVIDENCE INVESTMENTS

- 3.3. You retain the right to withdraw your consent and stop the use of your information at any time. This can be done by adjusting your account settings, closing your account, or contacting us at info@providence-investments.com.
- 3.4. Please note that we do not engage in selling, renting, or disclosing your Personal Data to third parties for monetary gain or any valuable consideration, and we have no intention of adopting such practices.
- 4. Cookies**
- 4.1. We, along with our trusted partners, use cookies and similar technologies in our services, including when you visit our website or access our Services. A cookie is a small piece of data that a website places on your device while you browse. Cookies are beneficial and serve various functions. They help facilitate seamless navigation, automatically activate specific features, remember your preferences, and improve the interaction between you and our Services. Additionally, cookies ensure that advertisements displayed are relevant to you and compile statistical information on how you use our Services.
- 4.2. Our website www.providence-investments.com utilizes the following types of cookies:
- a. **Session cookies:** Stored temporarily during a browsing session, enabling normal use of the system and automatically deleted once you close your browser.
 - b. **Persistent cookies:** Stored on your device for a set duration, allowing us to recognize you on future visits. These cookies enable us to retain your preferences for subsequent log-ins.
 - c. **Third-party cookies:** Placed by external services that feature content on our website, such as analytics providers monitoring our site usage.
- 4.3. For additional details, please refer to our Cookie Policy.

PROVIDENCE INVESTMENTS

5. Third-party collection of Personal Data

- 5.1. As part of our marketing efforts, we use a tool called “Google Analytics” to gather insights about your website usage. Google Analytics collects data like the frequency of visits, pages visited, and general site interaction, without associating it with your name or other personally identifiable information. The IP address used during your visit is recorded, but it is not linked to other personal data. Google’s use and sharing of this data are governed by the Google Analytics Terms of Use and Google’s Privacy Policy.
- 5.2. We may also request additional information from trusted third parties for anti-money laundering (AML) checks and know-your-customer (KYC) verification.

6. Sharing your Personal Data

- 6.1. We do not sell, rent, or share your Personal Data with third parties, except as outlined in this Privacy Policy.
- 6.2. We may transfer or disclose Personal Data to our subsidiaries, affiliated companies, and/or business introducers to deliver the services you requested, fulfill contractual obligations, and meet legal and regulatory requirements.
- 6.3. We may share your Personal Data with third parties that process data on our behalf to provide services or products either to you or us for the purposes described. These third parties may include:
 - a. **Professional advisors:** Lawyers, insurers, auditors, translation agencies, and tax consultants.
 - b. **Compliance and screening services:** Providers of due diligence, financial crime screening, and databases.
 - c. **IT services and consultants:** Cloud storage, hosting, and technical support providers.

PROVIDENCE INVESTMENTS

- d. **Payment processors:** Including card processing companies, payment gateways, and cloud storage providers.
 - e. **Other service providers:** Such as banks, subcontractors, agents, and entities within our corporate group.
- 6.4. We may disclose Personal Data or any information submitted via our services if we believe in good faith that such disclosure is necessary or appropriate to:
- a. Comply with laws, regulations, legal processes, or requests from government agencies;
 - b. Enforce our policies (including agreements), including investigation of potential breaches;
 - c. Act to prevent physical harm, financial loss, or in the investigation of suspected or confirmed illegal activities;
 - d. Support the prevention, detection, and investigation of fraud, illegal activities, or other criminal acts;
 - e. Establish or exercise our legal rights or defend against legal claims;
 - f. Protect the rights, property, or safety of ourselves, our users, or any third party;
 - g. Assist law enforcement or fulfill other legal obligations related to intellectual property or legal rights enforcement.

7. Cross-border transfers of your personal data

- 7.1. When we transfer your personal data outside Mauritius, we ensure its protection and that the transfer complies with applicable legal requirements, obtaining your consent where necessary.

PROVIDENCE INVESTMENTS

- 7.2. We may implement appropriate safeguards (such as contractual obligations) in line with relevant data protection laws to guarantee that your personal data is adequately safeguarded.
- 7.3. During our business operations, we may transfer and store your personal data with web hosting or cloud service providers located outside Mauritius.
- 7.4. You may request additional information regarding the safeguards we have in place for transfers of personal data outside Mauritius.

8. Retention of your personal data

- 8.1. We retain your personal data only for as long as is necessary for the specific purposes for which it was collected. However, in some cases, we may be required to store certain personal data for extended periods due to considerations such as:
 - a. Legal requirements under applicable laws to keep records for a specified duration;
 - b. The need to maintain business records for analysis or audit purposes;
 - c. The necessity to defend or pursue legal claims;
 - d. Addressing complaints related to our services; and
 - e. Guidelines from relevant data protection authorities.
- 8.2. Certain anti-money laundering laws require us to keep records for an extended period (even after you are no longer a customer), including copies of documents used to meet our obligations to you and records of transactions conducted with you.

9. Deletion and rectification requests

- 9.1. You have the right to request the correction of inaccurate personal data. At any time, you may contact us via email to update or amend your personal data.
- 9.2. You may also request that we rectify errors or delete your personal data (except for transaction history or other legally required data) by emailing us.

PROVIDENCE INVESTMENTS

- 9.3. Requests for deletion or correction can be submitted in free form (e.g., within an email or scanned document) including your full name and contact details for quicker processing. We reserve the right to decline your request if we cannot verify your identity.
- 9.4. By default, personal data is deleted when there is no legitimate purpose for its ongoing processing or storage, or when legal requirements no longer mandate its retention.
- 9.5. Unless instructed otherwise, we retain collected data as long as necessary to provide our services and fulfill legal obligations, resolve disputes, and enforce agreements. We may amend, complete, or delete inaccurate or incomplete information at our discretion.

10. Account deletion

- 10.1. You may request deletion of your account at any time by sending a blank message with the subject "delete account".
- 10.2. In compliance with applicable laws and regulations, we may retain necessary personal data to prevent fraud, abuse, or other harmful actions, as well as to meet legal requirements. Upon account deletion, we will minimize and anonymize data to the extent possible and cease using it for purposes beyond those specified here, including advertising and marketing.

11. Protection of your personal data

- 11.1. We prioritize the security of our physical facilities, servers, and website, employing recognized security tools and procedures to protect your personal information.
- 11.2. To protect the personal data we manage, we implement both technical and organizational measures against accidental or deliberate risks, including unauthorized access, loss, or destruction.

12. Your Rights

- 12.1. Your rights regarding personal data include:

PROVIDENCE INVESTMENTS

- a. **Right to access:** You are entitled to request confirmation from us on whether we process your personal data and to receive a copy of such data. Additionally, you have the right to supplementary information as provided by this Privacy Policy. Be aware that there may be certain cases where we are legally allowed to decline requests for copies of personal data. Specifically, any information covered by legal professional privilege will not be disclosed except as permitted by you.
- b. **Right to rectification:** You have the right to have incomplete or inaccurate personal data corrected or completed.
- c. **Right to erasure:** This right allows you to request the deletion of your personal data in cases where its processing is unjustified. However, please note that we may be legally required or entitled to retain certain data even if you request erasure.
- d. **Right to restrict processing:** You have the right to request limitations on the processing of your personal data under certain circumstances.
- e. **Right to object:** In specific cases mandated by law, you may request that we stop processing your personal data.
- f. **Right to data portability:** You have the right to obtain your personal data in a structured, commonly used, and machine-readable format and/or transmit it to another data controller.
- g. **Right to withdraw consent:** You may withdraw your consent at any time. However, in some cases, we may continue processing your data based on other lawful grounds. Withdrawing consent does not affect the legality of any processing conducted prior to your withdrawal.
- h. **Right to file a complaint:** You are entitled to lodge a complaint concerning our processing of your personal data.

PROVIDENCE INVESTMENTS

- 12.2. If you wish to exercise your rights or are dissatisfied with our handling of your personal data, or if you have any questions about the processing of your personal data, please first contact our Data Protection Officer.
- 12.3. Requests can be submitted in free form (e.g., in the body of an email or a scanned document) and should include your full name and contact information to expedite processing. In cases where we are unsure of your identity, we may ask for proof of identity. We reserve the right to decline your request if we cannot confirm your identity.

13. Changes to this privacy policy

- 13.1. As our website and the information displayed on it may be updated over time, we may also need to make changes to this Privacy Policy. Any significant updates regarding the purpose of data processing, the identity of the data controller, the exercise of rights, and cross-border transfers will be communicated within a reasonable period before these changes come into effect.
- 13.2. You may request a copy of the current privacy policy using the contact information provided above. If changes are made to this policy, the revised version will be promptly posted on our website.

14. Contact us

If you have any questions, complaints, or concerns about how your personal data has been handled, please reach out to our Data Protection Officer.