PRIVACY POLICY

Century Financial Limited
Registered Address: IMAAD Complex, 3rd Floor, Office 12, Ile Du Port, Mahe, Seychelles
License Number: SD235 | Registered and regulated by the Financial Services Authority (the "FSA") in Seychelles.

Version 2.0 – 30-Jun-26

1. INTRODUCTION

Century Financial Ltd ("Century", "us", "we" or "our") appreciates your interest in our services and is committed to protecting and respecting your privacy. This Privacy Policy, together with the Client Agreement (published on the Company's website at https://centuryfinancial.com/sc) and any other policy/documents referred to in it, sets out how we collect, processes and use your personal data when you use our services, such as our website, portals, content and features (regardless of where you visit it from) or through your engagement with us otherwise.

Please read our Privacy Policy carefully to understand what information we collect, process, and use, as well as your privacy rights.

This Policy is governed by the Data Protection Act, 2023 (DPA 2023) of Seychelles, as well as other applicable laws, including regulations and guidance issued by the Financial Services Authority (FSA).

Capitalized terms used herein shall have the same meaning ascribed to them in the Terms of Business.

2. GENERAL TERMS

We shall update this Privacy Policy from time to time. We therefore ask you to review our Privacy Policy on a regular basis.

By accessing Century's digital platforms (website, portals, apps, etc.), you accept this "Privacy Policy". If you do not agree to this Privacy Policy, do not proceed further to access services on our website or other Century platforms.

We are committed to complying with all applicable data privacy regulations. In accordance with these regulations, we have appointed a Data Protection Officer ('DPO') responsible for overseeing compliance with this privacy policy and addressing any questions related to data protection rules, regulations, and measures.

Please contact the DPO using the information below if you have any queries regarding this privacy policy, including requests to exercise your legal rights.

Attn: Data Protection Officer
Century Financial Ltd
The IMAD Complex, 3rd Floor, Office 12, Ile Du Port, Mahe, Seychelles
Email: info.sc@centuryfinancial.com

3. COLLECTION OF PERSONAL DATA

"**Personal Data**" refers to any personal information that may be used and collected by the Company either alone or in combination with other information in the course of this business relationship, including through your use of the Company's website and/or Platform.

"Personal Information" includes, but is not limited to, a first and last name, ID numbers, financial data (including trading data, deposits, withdrawals, and credit), email and physical addresses, other contact information, tax and financial data such as tax residency information, and numbers, as well as financial information which is required to establish and maintain a client economic profile.

3.1 Automatic Collection of Personal Information

The Company collects the following personal data automatically when an individual browses the Company's website:

- *Technical Data*: - An Internet Protocol (IP) address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct website trend and performance analysis;
- *Operating system information*: The type of operating system of the computer from which an individual accesses our website can also be recorded;
- *Cookies*: The Company uses cookies to secure clients' trading activities and to enhance the performance of the Company's website. Cookies used by the Company do not contain personal information or other sensitive information; and
- *Information regarding the frequency of visits* to our website.

3.2 Personal Data collected upon registration

When an individual registers as a client of Century Financial Ltd (hereafter referred to as a "Client"), the Company collects information required to open a trading account, perform transactions, and safeguard the clients' assets and privacy. In this respect, the Company gathers information from Clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or other sources, which will help the Company to construct the Clients' profile based on their requirements and preferences in order to provide its services effectively. The information the Company collects includes information required to communicate with and identify its Clients. The Company may also collect certain demographic information, including birth date, education, occupation, etc. The Company also assesses trading related information.

The following documents will be required when opening a trading account:

a) Proof of identification: certified true copy of an international passport with at least 6 (six) months' validity.

b) Proof of residence: certified true copy of a valid utility bill (electricity/gas/water/bank statement) that matches the full name and address as the one provided during the registration process.

c) Evidence of your credit card or bank details as proof of deposit.

In addition, the following information may also be collected from individuals who create an account with the Company:

a) Personal information, including name, date of birth, email, full permanent addresses, telephone number, identity document, proof of residence, country of residence, details of employment, employment status, financial background, the individual's current financial circumstances, the individual's foreign exchange preferences and tolerance to risk, and other matters that are relevant to the services we provide;

b) Information required when subscribing for services, such as to receive updates either via email or by posting on portions of the Company's website only accessible to individuals with accounts; and

c) Any other personal information you may provide to the Company. Additionally, throughout the use of the Company's services by a client, the Company will gather a set of data related to the details of any and all requests and transactions made by the Client through the Company's platform.

In general, the Company collects and processes the Personal Data for any of the following reasons:

a) To perform its contract with you;
b) To comply with legal and regulatory requirements (e.g., anti-money laundering laws, financial services laws, commercial companies' law, privacy laws, and tax laws);
c) To safeguard its legitimate interest.

The Client acknowledges that all or part of the data concerning the Client's account and related transactions will be stored by the Company and may be used by the Company in case of dispute between the Client and the Company.

Additionally, the Company reserves the right to disclose information where required by law, regulatory, law enforcement, or other government authority in order to protect the Company's rights and to comply with such legal proceedings.

4. LEGAL BASIS FOR PROCESSING PERSONAL DATA

Under the Seychelles DPA 2023, there must be a lawful basis for all processing of Personal Data (unless an exemption or derogation applies). We rely on:

a) Contractual necessity: Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract to conduct regulated activities, when processing is necessary for the entering into, or performance of a contract with the data subject or in order to take steps at his or her request prior to the entering into a contract.

b) Compliance with legal obligations: Processing is necessary for compliance with our legal obligations. Century is required to comply with the applicable law and regulations, including those issued by the FSA.

c) Legitimate interest: Data will only be processed where it is necessary for the purposes of the legitimate interests pursued by Century, and these interests or fundamental rights are not overridden by the interests, rights, and freedoms of the data subject, and the processing would not cause unwarranted harm. For instance, it is a legitimate interest of Century to process Personal Data on data subjects in order to expand the business, develop new business relations, prevent fraud, maintain the security of our systems if/when necessary, and enhance, modify, or improve our services. The data subject must be given information on the specific legitimate interest if the processing is based on this provision.

5. USE OF PERSONAL DATA COLLECTED

The Company uses Clients' Personal Information only as required to provide quality service and security to its Clients. This information helps the Company to improve its services, customize browsing experience, and enables it to inform its Clients of additional products, services, or promotions relevant to Clients, and in this respect, the Clients are required to provide their consent in regard to the usage of this data for such purposes.

Specifically, the Personal Data may be used for the following purposes:

a) to enter into a contractual relationship with Clients;

b) to ensure compliance with our terms & conditions and our relevant policies;

c) to comply with anti-money laundering laws and regulations. Specifically, the Company's Compliance Officer may have access to the Client's Personal Data under his continuous obligation to monitor and investigate all suspicious transactions;

d) to assess the appropriateness of a certain financial instrument, request, or transaction. For these purposes, the Company may consider the following matters: the Client's level and field of education, employment, professional experience, and investment background;

e) to categorize clients as either a retail client, a professional client, and/or other eligible counterparty;

f) for marketing purposes;

g) for statistical purposes; and

h) to improve the quality of our services and develop new ones.

If a Client does not wish to provide consent for any of the purposes listed above, they may inform the Company by contacting us via the details provided in our Terms of Business or at info.sc@centuryfinancial.com.

5.1. **Who do we share your personal information with?**

We will not rent or sell your information to third parties outside of Century without your consent. We also impose strict restrictions on how our processors can use and disclose the data we provide.

Here are the types of third parties we share information with:
Service providers and other partners: We transfer information to service providers (processors), and other partners who globally support our business, such as providing technical infrastructure services, trading platforms analysing how our Services are used such as measuring the effectiveness of ads and services, providing client service and support, client on- boarding, client identity verification, including PEPs and sanctions, conducting marketing communications and design, services related to our website management, services related to software and business development services.

Measurement and Analytics Services: Partners who use our analytics services, like Google Analytics (Non-Personally Identifiable Information Only). We do not share information that personally identifies you (personally identifiable information is information like name or email address that can by itself be used to contact you or identify who you are) with advertising, measurement, or analytics partners.

Century does extensive due diligence before choosing processors, assuring that they provide sufficient safeguards, in particular in terms of expert knowledge, data governance, data security, cyber resilience, reliability, and resources to implement technical and organisational measures in such a manner that processing will meet the requirements of data security regulatory requirements and ensure the protection of the rights of the data subject.

The adherence of the processor to an SLA contract is used as an element to demonstrate compliance with the obligations of the controller. This data sharing with our processor enables us to proceed with our regulated activities and duties to know your customer (KYC) obligations in order to meet our regulatory obligations relating to assessing the appropriateness of our products and services, providing support to clients, etc.

5.2. **What happens in the event of a change of control?**

If we sell or otherwise transfer part or the whole of Century or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), your information, such as name and email address, and any other information collected through the Service, may be among the items sold or transferred. You will continue to own your user-generated data. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

User-Generated Data refers to any data, information, or content that you, as a user or client, create, upload, provide, or submit to the Service through your interactions, transactions, or communication with us. This includes, but is not limited to, personal information, account details, trading activity, messages, feedback, preferences, or any other content you contribute while using our services.

6. CONSENT

The Company is committed to protecting your Personal Data in accordance with the DPA 2023. We process your Personal Data primarily to perform our contractual obligations (e.g., opening and managing your trading account), comply with legal requirements (e.g., anti-money laundering laws), or pursue legitimate interests (e.g., service improvement), as outlined in Section 4. Where we rely on your consent as the lawful basis for processing, such as for marketing communications, we will seek your specific and informed agreement.

By using our website and/or platform, you acknowledge this Privacy Policy, but consent for optional processing (e.g., receiving promotional emails about our services or those of affiliated companies) is not mandatory. You may opt out of marketing communications at any time by clicking 'unsubscribe' in our emails, updating your preferences in your account settings, or contacting us at info.sc@centuryfinancial.com. If you withdraw consent for optional processing, this will not affect our ability to provide core services where processing is based on other legal grounds. However, if you refuse to provide data required for mandatory purposes (e.g., KYC verification), we may be unable to offer our services, as detailed in Section 10.
This applies to both current and prospective clients, regardless of account approval status. For further clarification on how your consent applies, please contact our Data Protection Officer.

7. DISCLOSURE OF INFORMATION

Under the Company's Terms of Business, other policies and Agreement between the Client and the Company, the Company has the obligation to disclose the Client's information in certain cases, including:

a) Where requested, the Company's regulator, the FSA of Seychelles, or any other regulatory authority.

b) Where required by law or a court.

c) Where required in order for the Company to defend or exercise its legal rights to any court, Ombudsman, or governmental authority.

d) To Company's affiliates: The Company may share information with its affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to its Clients. These may include affiliates to which the Company may delegate functions and activities such as: Internal audit, Legal support, Finance, and accounting.

e) The dissemination of Personal Information shall be based on the need-to-know principle. The Company may share information with partners, affiliates, and associates in order to offer additional similar products and services that meet Clients' needs and which are delivered in a manner that is useful and relevant only where Clients have authorized the Company to do so. In such cases, the relevant professionals are informed about the confidential nature of such information and commit to the confidentiality obligations. The Company does not sell, license, lease, or otherwise disclose Clients' personal information to third parties, except as described in this Privacy Policy.

f) To the Company's non-affiliated third parties: The Company may share Personal Data with non-affiliated third parties in a non-identifiable form, i.e., the individual to whom the data belongs cannot be identified and/or the data has been anonymised.

g) For marketing purposes, the Company may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable.

h) To administer and improve the Company's website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

i) The Company reserves the right to disclose personal information to third parties where required by law, regulatory, and other government authorities. The Company may also disclose information as necessary to credit reporting or collection agencies, as reasonably required, in order to provide the services to its Clients.

j) In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfilment, Client service, Client satisfaction surveys, or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose.

All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. In cases where Clients have been introduced by a Referral Partner, such a referral partner may have access to Clients' information. Hence, Clients hereby consent to the sharing of information with such Referral Partner.

8. DATA RETENTION

We can only keep the data we collect from you for so long as it is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

Accordingly, your Personal Data will be retained in accordance with the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice, and the Company's business purposes. Any personal information stored by the Company may be extracted upon request.

Subject to Applicable Regulation, the Company will keep your data, including personal data, trading information, communications, call recordings, and anything else that relates to the Client for a minimum period of 7 (seven) years from the date of termination of the business relationship with the Client. The data storage period may be extended upon the request of the competent authority.

During the data retention period, the Company shall continuously review the collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to the Company's systems.

Certain information may be retained for an extended period of time for specific business or legal requirements, including for security, fraud and abuse prevention, financial record-keeping, and compliance.

9. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

Regardless of the above, your Personal Data belongs to you. Accordingly, please note that you are always entitled to request details of the information the Company holds about you and how it is processed. We will respond to requests for Personal Data and, where applicable, will correct, amend, or delete your Personal Data. Under certain circumstances, you have rights in accordance with the provisions of the DPA 2023 and the applicable local legislation as amended from time to time.
We advise you to contact the Company with regard to your request/rights. We will respond to your requests—such as for access, correction, or erasure—within one month of receipt, as required by law. In complex cases or where multiple requests are received, this period may be extended by an additional two months, and we will inform you of any delay with reasons.

Some of the rights can be considered complex and include exemptions, and we encourage you to contact us for clarification:

a) Fair processing of information and transparency over how we use your personal information;

b) The right to access Personal Data.- should be made in writing to info.sc@centuryfinancial.com. We may ask you for proof of identity before providing you with the data.

c) The right to request that your Personal Data is corrected if it is found to be inaccurate. It requires us to correct any mistakes in your information that we hold.

d) The right to request that your Personal Data is erased where it is no longer necessary. In some circumstances, this right may not apply, e.g., if there is some other compelling reason for us to keep or process your data (and we will inform you in response to your request if that is the case).

e) Right to data portability, to receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transmit that data to a third party (another controller) in certain situations.

f) The right to withdraw consent to processing at any time, where relevant, i.e., where we are relying on your consent to process the data and not another legal reason for processing.

g) The right to object at any time to the processing of personal information concerning you for direct marketing.

h) The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning them or significantly affects them.

i) The right to object in certain other situations to our continued processing of your personal information.

j) Otherwise, restrict our processing of your personal information in certain circumstances.

k) You also have the right to lodge a complaint in relation to the Company's processing of your Personal Data with a local supervisory authority. Our aim is to use your Personal Data only as directed and to keep our information about you as accurate as possible. We strive to ensure that the Personal Data we hold is accurate and up to date.

If you have any enquiries about the Company's use of the Client Personal Data, please contact us at info.sc@centuryfinancial.com.

If you are unsatisfied with the Company's response, you have the right to lodge a complaint with the Information Commission of Seychelles, in accordance with the DPA 2023.

10. CLIENT OBLIGATIONS

The Company is required to obtain and maintain the Client's Personal Data under Applicable Regulations. As such, clients are always obligated to provide the Company with accurate and complete information and to update the Company immediately regarding any changes to such information. If the Client fails to provide the Company with accurate and complete information and Personal Data, the Company may stop providing any services to the Client.

11. BREACH OF SECURITY

The Company's information technology department is responsible for ensuring the security of the platform and the clients' information. The department proceeds with the daily check of the event logs, the status of all hardware and software to detect any issues and to take corrective action, and ensures the uninterrupted operation of the Company's platforms and the minimization of any risk associated with loss of data.

For these purposes, the following steps are taken:

a) Frequent backups of system data are performed.
b) Sufficient redundancy is built into the hardware to ensure that the risk of interruption from component failure is minimized.
c) Internet connectivity redundancy is arranged.
d) All online real-time trading systems are backed up in real time to servers.
e) All computers are to be password-protected.
f) Access to software and different software modules is restricted to specific users.
g) Monitoring that the Company's anti-virus systems are up to date.
h) Implementation of a strict Chinese wall policy to ensure there are effective physical and logical barriers in place to prevent the passing of personal information.

All employees of the Company shall be advised to treat personal information with due care and are obliged to safeguard it and use it only for the purposes listed in this Privacy Policy.

Unfortunately, no data transmission can be entirely secured and guaranteed. The Company makes every effort to safeguard your Personal Data and privacy. Notwithstanding any measures we take to protect your Personal Data, we cannot guarantee that: (i) such security measures will prevent our computers from being accessed illegally, and (ii) the Personal Data on them from being stolen, misused, or altered.

In accordance with the DPA 2023, the Company has established an internal data breach procedure to be followed in the event that any Personal Data is destroyed, lost, altered, or subject to unauthorized access or disclosure resulting from a security breach. Data breaches or leaks that may pose a risk to individuals will be reported to the Information Commission of Seychelles without undue delay, and, where feasible, within seventy-two (72) hours of becoming aware of the breach. Any breach that is likely to result in a high risk to the rights and freedoms of individuals will also trigger an obligation to notify the affected data subjects directly.

12. INTERNATIONAL TRANSFERS OF PERSONAL DATA

As a global financial services provider, your Personal Data may be transferred to, stored, or processed in countries outside Seychelles, including jurisdictions that may not offer the same level of data protection. Such transfers may occur to support our operations, including hosting data with service providers or sharing information with affiliates for client support.

When transferring your data internationally, the Company takes all reasonable steps to ensure that it is treated securely and in accordance with the DPA 2023 and FSA requirements. These steps include:

a) Using standard contractual clauses or other mechanisms recognized under applicable law to guarantee adequate protection;
b) Ensuring that recipients implement appropriate technical and organizational measures to safeguard your Personal Data.

If transfers are required by law (e.g., to comply with regulatory requests), we will ensure they remain lawful and proportionate. For more information on the specific mechanisms we use or the countries involved, please contact our Data Protection Officer at info.sc@centuryfinancial.com.

13. RESTRICTION OF RESPONSIBILITY

The Company is not responsible for the privacy policies or the content of sites to which our website (https://centuryfinancial.com/sc) links and has no control over the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded website or to a linked website, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

14. PRIVACY POLICY UPDATES

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy, including how it collects, processes, or uses Clients' personal information, the revised Privacy Policy will be uploaded on the Company's website. In this respect, the Clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its Clients. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its Clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it, and to whom it may disclose it, in accordance with the provisions of this Policy.

If you object to the processing of your Personal Data, or if you have provided your consent to processing and you later choose to withdraw it, the Company will respect that choice.

In case you want to exercise your right to review a copy of, amend, or erase the Personal Data the Company holds about you, or would like the Company to stop using your Personal Data in the manner in which you previously consented, or if you have any questions about the Company's use of your Personal Data, please contact the Company as set out below. Please note that even after you have chosen to withdraw your consent, we may be able to continue to process your Personal Data to the extent required or otherwise permitted by law, in particular to comply with any legal, audit, internal, and record-keeping requirements.

15. FURTHER INFORMATION/QUERIES

The Company is committed to protecting your Personal Data. If you wish to contact us with regard to our Privacy Policy or your data, you can email us at info.sc@centuryfinancial.com. Alternatively, you could also write to us at: IMAD Complex, 3rd Floor, Office 12, Ile Du Port, Mahe, Seychelles.

Century Financial Ltd.
Registered Address: IMAD Complex, 3rd Floor, Office 12, Ile Du Port, Mahe, Seychelles
License Number: SD235 | Registered and regulated by the Financial Services Authority (the “FSA”) in Seychelles