



## Privacy Policy

**We strongly advise you to thoroughly review this policy before accessing the Website or utilizing any of the company's Services.**

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## PREAMBLE

1. This Privacy Policy (hereinafter referred to as “Policy”) outlines the procedures and steps DIGITAL TRADING GROUP OF CENTRAL AMERICA, S.A. DE C.V. (hereinafter referred to as "DTGoCA," "Company," "we," "us," or "our," as applicable), with its registered office at Av La Revolucion #Nivel 6 Apto. Local 12, San Benito, Presidente Plaza, Distrito San Salvador, Municipio De San Salvador Centro, Departamento De San Salvador, El Salvador, follows to uphold the utmost standards of confidentiality and safeguard the privacy of its Clients, related individuals, and other persons whose personal data it collects and processes. This commitment includes providing clear and open communication regarding the scope and nature of such data processing, as well as informing you of any rights you may have in connection therewith.
2. This Policy sets forth the manner in which we collect, use, disclose, and safeguard personal information pertaining to: (i) individuals who apply for or utilize our products and Services, (ii) former clients who have concluded their contractual relationship with the Company, (iii) visitors to our Website, and (iv) Trusted Contact Persons.
3. The scope of this Policy extends to the websites [www.finprime.pro](http://www.finprime.pro) and [www.dtg-ca.com](http://www.dtg-ca.com), including all related sub-domains, as well as any mobile applications that we own and manage. The data we collect is stored in our secure databases (and any relevant off-site backups).
4. If you do not consent to the use of your personal data as outlined in this Policy, you should refrain from accessing or using the Website, as well as from utilizing any Services we provide, or you should revoke your consent. Please note, however, that under Salvadoran law (and in some other jurisdictions as well), consent is not the sole legal basis for processing personal data. In certain circumstances we may process your personal data without consent, for example, where such processing is necessary to perform a contract with you, to comply with legal or regulatory obligations, to protect vital interests, to carry out tasks in the public interest, or to pursue our legitimate interests, provided that such interests do not override your fundamental rights and freedoms.
5. Any capitalized terms not defined in this Policy shall carry the meanings assigned to them in the Terms and Conditions.
6. This Website and the Services we offer are not intended for individuals under the age of 18, and we do not knowingly gather personal data from anyone under 18 years of age. In the event that we become aware that personal data from a person under the age of 18 has been submitted to us through this Website or by any other means, we will take appropriate measures to remove such data. If you suspect that we may have inadvertently received personal data from a minor under 18, please notify us promptly.

7. As per current Salvadoran Data Protection Law (Decree No. 144/2024) we process data only on valid legal grounds (your consent, contractual necessity, legal obligations, etc.) as required by the principle of licitude and limit collection to data strictly needed for the stated purposes (the data minimization principle).

## COLLECTION OF PERSONAL DATA

### *What are personal data*

For the purposes of this Policy, "Personal Data" refers to any information that, whether on its own or combined with other details, allows for your direct or indirect identification. Examples include, but are not limited to, your name, email address, username, contact information, or any distinctive identifier such as an IP address, device ID, or other digital identifiers.

### *WHAT PERSONAL DATA WE COLLECT*

1. The specific types of Personal Data collected will vary based on the actions you undertake via our Website and Trading Platform. Please be aware that certain Personal Data is necessary for the formation of a contractual relationship with the Company. Individuals who choose not to supply this data will be unable to open an Account or access the Company's products and/or Services.
2. We may gather, process, store, and share various categories of your Personal Data, which we have classified as follows:
  - Identification Information includes, but is not limited to, first name, maiden name, surname, username or similar identifier, marital status, honorifics, nationality, date of birth, and gender;
  - Contact Information comprises billing address, email address, phone numbers, cryptocurrency wallet addresses;
  - Financial Information includes details of bank accounts and payment card information, estimated annual earnings and net worth, source of income, profession, employer details, job title, investment holdings, liquid assets, and any other relevant financial details;
  - Transaction Information encompasses specifics of transactions, including the date, value, and currency of deposits, withdrawals, or transactions, payment methods, and descriptions of any products or services you have acquired from us;
  - Technical Information covers internet protocol (IP) addresses, login data, browser type and version, time zone settings, location, browser add-ons, operating systems, platforms, and other technological data related to the devices you use to access the Website and/or Trading Platform;
  - Profile Information includes usernames, passwords, preferences, feedback, and responses to surveys;

- Usage Information refers to data on how you interact with our Website, products, and services, including page activity (such as scrolling, clicks, and mouse movements), methods of navigation away from the Website;
  - Marketing and Communication Preferences include your choices concerning receiving communications and marketing materials from us and third parties, as well as your communication preferences;
  - Verification Documents encompass information contained in documents provided for identity verification purposes, such as passports, utility bills, bank statements, or company registration documents;
  - Trusted Contact Person Data includes the name, surname, phone number, relationship to the Client who authorized you, and your address.
3. Please be aware that all telephone conversations and other communications with us may be recorded and retained for our business purposes, including dispute resolution or in connection with legal proceedings.

#### *HOW WE COLECT PERSONA DATA*

1. Personal data may be obtained:
  - From you:
    - a) directly from you, such as when you register an Account or engage with our Services and communicate with us,
    - b) indirectly, such as through your browsing activity on our Website (see Cookies Policy).
      - From external sources:

Additionally, we may acquire Personal Data about you from external sources, including third parties assisting us with updating, expanding, and analyzing our records; detecting and preventing fraud; processing payments; or evaluating your use of our Services.

- From public sources:

We also lawfully obtain and process Personal Data from publicly accessible sources (including, but not limited to, the media, social networks, and the internet). Furthermore, our Services may feature embedded content or links to material provided by third parties (e.g., live chat functions, social media content, plug-ins, and applications).

## PURPOSES OF DATA COLLECTION

We process your Personal Data for one or more of the following reasons:

- To manage your Account with us;
- To enhance the security of our information systems and networks;
- To verify your identity and perform necessary credit assessments;

- To understand your needs and determine your eligibility for certain products or Services;
- To assess, establish, and maintain the contractual relationship between you and the Company, and to deliver products and Services to you;
- To provide you with transaction-related services;
- To comply with applicable data protection regulations and other legal obligations, including court orders, tax laws, reporting requirements, and anti-money laundering measures;
- To protect clients from financial abuse in cases involving a Trusted Contact Person;
- To facilitate transactions, such as deposits, chargebacks, and payments, and to monitor trading activity for any irregularities or potential illegal activities;
- To process billing and collect fees;
- To inform you about updates and new products, including any changes or improvements to the Website;
- To keep you informed about matters relevant to your business relationship with us;
- To use your pseudonymized data to display advertisements for our products and services on social media platforms such as Facebook, Twitter, LinkedIn, YouTube, Google, or through third-party advertisements on other websites;
- To enhance the Website's content and user experience, customizing it for individual users, and to provide, maintain, and improve its features and Services;
- To identify, prevent, and investigate fraud, unauthorized transactions, and other illegal activities, and to manage risk exposure;
- To manage our business operations and ensure compliance with internal policies and procedures;
- To defend, investigate, or pursue legal claims;
- To review, investigate, and respond to any inquiries or feedback you may provide;
- To obtain professional advice;
- To use your pseudonymized data to display advertisements for our products and Services on social media platforms such as Facebook, Twitter, LinkedIn, YouTube, Google, or through third-party advertisements on other websites;
- To better understand your preferences and interests so that we can contact you with information and marketing communications that are more relevant to you;
- For statistical analysis aimed at improving our future products and services. Such data is anonymized and aggregated to prevent identification. We may share these statistics with third parties solely for the purpose of improving marketing strategies;
- Your email address may be used for communications related to our products and Services, including marketing campaigns.

## Data Retention Periods

We retain your Personal Data for as long as your account remains active, or as long as necessary to fulfill the purposes for which the Personal Data was initially collected. This may also include retention for other valid business reasons, such as complying with legal, regulatory, or compliance requirements. The duration for which Personal Data is held may vary depending on the specific purposes for which it was collected and the requirements of relevant laws or regulations. Once the Personal Data is no longer required, we will either anonymize it by removing identifiable information or securely dispose of it. However, certain information may be retained for an extended period to meet legal retention requirements, such as those related to tax obligations, fraud prevention, and anti-money laundering laws.

## External Websites

The Website may contain links to external sites or social media platforms. Please note that once you navigate away from the Company's Website, the Company has no control over those external sites. Therefore, the Company cannot be held responsible for the protection and privacy of any information you provide while visiting such sites, as they are not governed by this Policy. Please review the privacy policies and terms of use of those third-party sites to understand their practices. The Company will not be liable for any unauthorized or unlawful use of your Personal Data resulting from the misuse, negligence, or misplacement of your password, whether by you or a third party.

## RIGHTS CONCERNING PERSONAL DATA

1. You may have certain rights under Applicable law regarding the processing of your Personal Data. It is important to note that these rights may not apply in every situation. You are entitled to request access to some or all of the Personal Data we have collected and stored about you at the time of your request, or to have any inaccuracies corrected. If you believe that your Personal Data is incorrect, incomplete, or outdated, you may request a correction at any time. Unless we hold your Personal Data as part of a third-party administrative record-keeping function, we will promptly amend or update it upon verifying that the information is inaccurate or incomplete. To exercise these rights, please contact us using the details provided below.
2. For individuals who are currently residents of the European Union, you may have the following rights: (1) to inquire about the Personal Data we hold about you, its usage, and to request a copy of it; (2) to correct any inaccurate or incomplete Personal Data; (3) to request erasure of your data, subject to our legal obligations; (4) to request restrictions on processing under certain circumstances; (5) to withdraw consent where processing is based on consent; (6) to object to certain processing activities, including for direct marketing purposes; (7) to request the transfer of your Personal Data; (8) to file a complaint with a data protection

authority; and (9) to exercise rights related to automated decision-making and profiling. These rights may be subject to limitations, and in certain situations, we may not be able or required to fully comply with your request, or we may only be able to fulfill it in part. Additionally, we may not provide access to information that affects the privacy rights of other individuals unless we obtain their consent.

3. Pursuant to the Personal Data Protection Law of El Salvador (Legislative Decree No. 144), individuals located in El Salvador have the following rights regarding their personal data (so called ARCO-POL rights (Acceso, Rectificación, Cancelación, Oposición, Portabilidad y Limitación): (1) Right of Access (Acceso): To request confirmation of whether we process your personal data and to obtain a copy of such data; (2) Right of Rectification (Rectificación): To request correction of inaccurate or incomplete personal data; (3) Right of Cancellation (Cancelación): To request deletion of your personal data when it is no longer necessary for the purposes for which it was collected, or when processing is unlawful; (4) Right of Opposition (Oposición): To object, on legitimate grounds, to the processing of your personal data; (5) Right of Portability (Portabilidad): To receive your personal data in a structured, commonly used, and machine-readable format, and to transmit it to another controller; (6) Right of Limitation (Limitación): To request restriction of processing in certain circumstances, such as when contesting data accuracy.
4. You may exercise these rights freely and at no cost by submitting a request to our Data Protection Delegate at [legal@dtg-ca.com](mailto:legal@dtg-ca.com). We aim to respond within 20 business days (30 days in case of EU residents) from the date we receive your request, as required by Salvadoran law. Where necessary, we may request proof of identity to process your request securely. The request must come from an email address that is registered with us. We may ask for further confirmation before proceeding with any request.
5. If a request is manifestly unfounded, excessive, or repetitive, or if you request additional copies of the same data, we may charge a reasonable fee. In such cases, we will notify you of the fee, which must be accepted before we process your request. Alternatively, we reserve the right to decline requests under these conditions.

## Disclosure and Sharing of Personal Information

1. The personal information you provide to us, or that is provided by the Client in the case of a Trusted Contact Person, will not be shared with any third party without your explicit consent, except in the following situations:
  - When required by law, including to regulatory bodies, law enforcement agencies, or other governmental authorities;

- To assist in crime prevention, ensure legal compliance, or screen and compare data against sanctions and crime prevention databases;
  - To disclose information to our related entities, including current and future parent companies, affiliates, subsidiaries, or other entities under common ownership and control;
  - When the information has been made public by you or otherwise becomes publicly known without any action or omission by us;
  - To professional advisors, service providers, consultants, payment processors, IT hosting companies, banks, cryptocurrency exchanges, other financial institutions, and credit reporting agencies who require access to your Personal Data to perform services on our behalf;
  - To other companies assisting with internal operations, such as account management, order fulfillment, customer service, satisfaction surveys, or other business-related data collection;
  - If you were introduced to us through a business intermediary, we may share certain details of your dealings with us with that intermediary;
  - During the course of negotiations, or in connection with, any merger, sale of company assets, financing, or acquisition of all or part of our company by another entity;
  - If we believe that your actions violate our terms and conditions, or to protect the rights, property, and safety of our company or others;
  - To select third-party marketing automation providers for marketing activities or to third parties conducting verification processes on our behalf.
2. The use of any shared Personal Data is strictly limited to the specific task we have requested. Third parties with whom we share data are obligated to protect Personal Data with the same level of care and security as we do.

## Data Security Measures

1. We ensure that your Personal Data is stored and protected in compliance with relevant data protection laws applicable in our jurisdiction. We implement robust administrative, physical, and technical measures to secure the confidentiality, integrity, and availability of your Personal Data. Access to your Personal Data is restricted to individuals with a legitimate business need, and those handling your Personal Data are bound by confidentiality obligations.

2. We employ Secure Socket Layer (SSL) technology to safeguard the Personal Data you submit to us. Your Account details are stored in a secure area of our website, shielded by firewalls and other protective measures against unauthorized external access. If you are provided with or select a password to access certain sections of our Website or Trading Platform, you are responsible for maintaining the confidentiality of this password and are advised not to disclose it to others.
3. While we adhere to industry-standard security practices, you acknowledge that the nature of internet transmissions inherently involves risks. This includes potential exposure to unauthorized software, electronic intrusions, and issues with data transmission and reception. Consequently, we disclaim liability for any breaches of confidentiality or unauthorized access resulting from such risks.
4. Furthermore, your Personal Data may be transferred to or accessed from jurisdictions that may not offer the same level of Data Protection as your home country. Our Services cater to users globally. For users in the European Economic Area (EEA), any Personal Data collected may be transferred to and stored in locations outside the EEA, which may not provide equivalent data protection standards. In such cases, we have implemented appropriate safeguards to protect your Personal Data and ensure that you have recourse in the event of misuse. We will only transfer personal data outside El Salvador if the recipient country has protections comparable to Salvadoran law, or if we have obtained your explicit consent and implemented binding safeguards (e.g. data-transfer agreements mirroring the legal protections).
5. In the event of any unauthorized access or loss of personal data, we will promptly contain the incident, investigate its cause, and notify the Salvadoran State Cybersecurity Agency and any impacted data subjects no later than 72 hours after becoming aware of the breach. We will also implement any required remedial measures.

## OTHER PROVISIONS

1. We may use your Personal Data to offer you products and services that we believe may interest you. We will not do this if you tell us not to. If you do not wish to receive marketing offers from us, please send an email to us at [support@dtg-ca.com](mailto:support@dtg-ca.com).
2. We may ask for further information to confirm your identity before permitting you to exercise certain rights as specified above.
3. You agree to update information and Personal Data you provided to us upon our request, if we consider the information and Personal Data provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and

Personal Data and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our services to your profile based on such information and Personal Data.

4. We reserve the right to alter, revise or update this Policy or any part of it at any time without prior notice. All changes will take effect immediately upon being posted on the Website. The most recent version of the Policy will govern the processing of your Personal Data and will be accessible at [www.dtg-ca.com](http://www.dtg-ca.com). Your continued use of our Website and Trading Platform following the effective date of any changes constitutes your acceptance of those revisions. It is your responsibility to regularly review the Policy and any updates. In the event we make a material change to this Policy, as determined at our sole discretion, we may notify you via email to the address linked to your Account. Where required by law, we will seek your consent or to re-confirm your acceptance or provide you with the opportunity to opt out of any new uses of your Personal Data. Such acceptance or consent may be necessary for continued access to and use of the Trading Platform, Account and/or Services.
5. If you do not agree to any of the changes made to this Policy, you must stop using the Website, Trading Platform, Account and the Services immediately and notify the Company in writing without delay. You acknowledge and accept that your sole and exclusive remedy in such a situation is to discontinue the use of the Services and close the Account. You further agree that the Company shall not be responsible for any losses or damages incurred by the Client or any third party due to any modifications or amendments to the Policy.

## DATA PROTECTION DELEGATE

1. DTGoCA has appointed a Delegado de Protección de Datos Personales (Data Protection Delegate) who can be reached at [legal@dtg-ca.com](mailto:legal@dtg-ca.com) or in writing at the following address:

To attn: Data Protection Delegate, Av La Revolucion #Nivel 6 Apto. Local 12, San Benito, Presidente Plaza, Distrito San Salvador, Municipio De San Salvador Centro, Departamento De San Salvador, El Salvador.

## Enquiries and Contact Details

Inquiries, feedback, and requests concerning this Policy are encouraged and should be directed to [legal@dtg-ca.com](mailto:legal@dtg-ca.com) or submitted in writing to the following address:

Av La Revolucion #Nivel 6 Apto. Local 12, San Benito, Presidente Plaza, Distrito San Salvador, Municipio De San Salvador Centro, Departamento De San Salvador, El Salvador