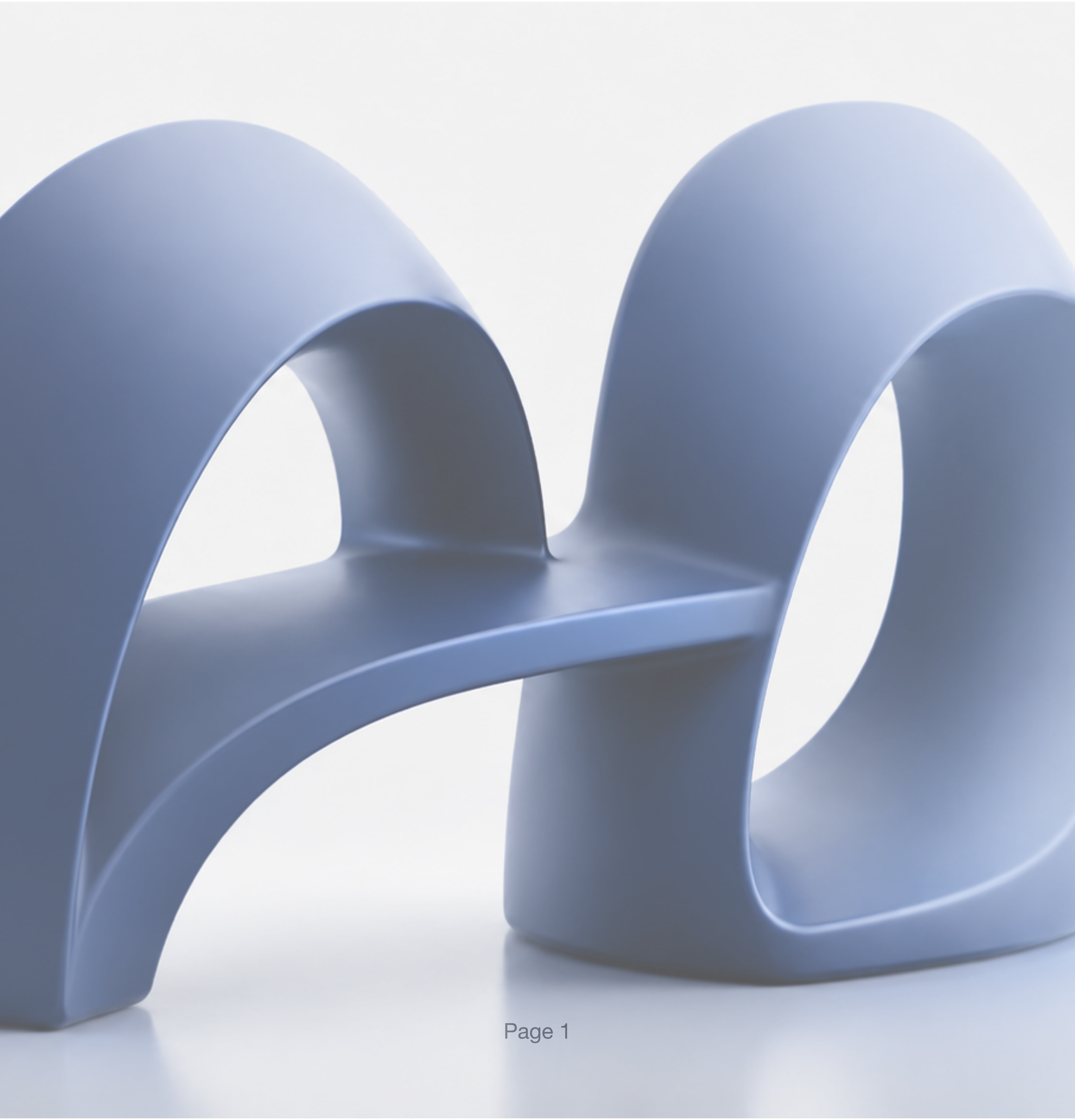
PRIVACY POLICY



HIDALGO HOLDINGS (PRIVATE) LIMITED - PRIVACY POLICY

Effective Date: 28 July 2023
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Company Name: Hidalgo Holdings (Private) Limited
Company Registration Number: PV 00279213
Website: www.hidalgoholding.com
Email: support@hidalgoholdings.com

INTRODUCTION

Hidalgo Holdings (Private) Limited, hereinafter referred to as **"Hidalgo Holdings", "Hidalgo", "the Company", "we", "our"** or **"us"**, recognises that the protection of personal information, confidential information, account-related information and financial-service information is an important responsibility arising from the relationship between the Company and its clients, prospective clients, subscribers, students, website visitors, business partners and other individuals who communicate or interact with the Company. This Privacy Policy explains the manner in which Hidalgo Holdings may collect, receive, record, organise, use, review, store, protect, disclose, transfer, retain, anonymise and securely delete personal information in connection with the operation of its website, client portal, account-management services, account-monitoring services, trading education and mentorship programmes, daily market-update subscriptions, trading-signal subscriptions, customer-support activities and any other service lawfully offered by the Company. Hidalgo Holdings is committed to processing personal information in a lawful, fair, reasonable, secure and transparent manner. The Company will seek to ensure that the information it collects is relevant to the purpose for which it is required and is not used in a manner that is materially inconsistent with the purpose communicated to the individual, unless such further use is authorised by law or supported by an appropriate legal basis.

This Privacy Policy should be read together with the Company's Client Agreement, General Business Terms, Risk Disclosure and Warning Notice, Cookie Notice, service descriptions, subscription conditions, payment terms and any other contractual or legal document applicable to the relationship between Hidalgo Holdings and the relevant individual. By accessing the Hidalgo Holdings website, registering through a client portal, submitting personal information, purchasing a subscription, entering into an agreement or using a service provided by the Company, the individual acknowledges that this Privacy Policy has been made available and that the individual has been given a reasonable opportunity to read and understand the manner in which personal information may be handled. An acknowledgement of this Privacy Policy does not amount to unconditional consent for every possible form of data processing. Where specific consent is legally required, Hidalgo Holdings will seek to obtain such consent separately and in an appropriate manner.

IMPORTANT CLARIFICATION REGARDING HIDALGO'S BUSINESS MODEL AND CLIENT FUNDS

Hidalgo Holdings does **not** ask clients to transfer investment capital to Hidalgo Holdings for the purpose of trading, investing, depositing, saving or holding such funds on behalf of the client. Hidalgo Holdings does **not** ordinarily receive, possess, safeguard or hold client trading capital in a bank account, investment account, pooled account, company wallet, custody account or other financial account controlled by Hidalgo Holdings.
Clients who participate in an account-management arrangement are expected to open and maintain their trading accounts directly in their own

names with an independent third-party brokerage or financial-service provider. The client's trading capital should remain within the client's own brokerage account, subject to the relevant broker's terms, conditions, security controls and regulatory requirements.

Where a client has voluntarily entered into a written agreement and has provided the necessary authorisation, Hidalgo Holdings may be permitted to monitor, handle or manage certain trading activities within the client-owned account. Such authorisation may include permission to view account information, review trading performance, execute trading decisions, apply an agreed strategy or provide related administrative support. The provision of account access or trading authority does not transfer ownership of the client's account, capital or trading assets to Hidalgo Holdings. The client remains the beneficial owner of the account and funds, subject to the terms imposed by the brokerage provider and any applicable law. Hidalgo Holdings generates income only through properly disclosed commercial charges connected with the services it provides. These charges may include:

- **Service and account-management fees:** Hidalgo Holdings may charge an agreed fee for providing professional services involving account monitoring, account handling, strategy implementation, trading administration, performance analysis or other account-management functions described in the relevant service agreement. Such payment represents consideration for the Company's services and does not constitute a capital contribution, trading deposit, investment placement or transfer of ownership in favour of Hidalgo Holdings.
- **Performance-related service charges:** Where legally permitted and expressly agreed in writing, Hidalgo Holdings may charge a performance-related amount calculated according to the methodology stated in the relevant agreement. Any such amount is a service charge payable after the relevant calculation and is not treated as client capital held or invested by Hidalgo Holdings.

- **Educational, mentorship and training fees:** Clients, students or subscribers may pay Hidalgo Holdings for courses, mentorship sessions, educational materials, market-learning programmes or other training services. These payments purchase educational or professional services and do not constitute investments managed or held by the Company.

- **Subscription payments:** Hidalgo Holdings may receive recurring or one-time subscription payments for market updates, general market analysis, trading insights, daily signals, platform access, premium content or other subscription-based services. Subscription payments are fees for access to content or services and are not amounts placed with Hidalgo Holdings for investment purposes.
- **Administrative and other agreed charges:** Hidalgo Holdings may receive administrative, onboarding, technology, support or other properly disclosed charges where such charges are expressly described in the relevant agreement, invoice, payment page or service terms. The payment of such charges does not create a deposit-taking, banking, brokerage, custodial or collective-investment relationship.

1. INFORMATION WE MAY COLLECT

The type and amount of information collected by Hidalgo Holdings will depend on the relationship between the Company and the relevant individual, the service requested, the information voluntarily provided, the security requirements of the Company and any legal or contractual obligations applicable to the particular service. Hidalgo Holdings may collect the following categories of information.

1.1 Identity and personal information

- **Personal identification details:** Hidalgo Holdings may collect an individual's full legal name, preferred name, title, date of birth, country of residence, nationality, citizenship and other basic identifying information where such information is reasonably necessary to identify the individual, establish a client relationship, maintain accurate business records or provide the requested service.
- **Government-issued identification:** Where verification is reasonably required, the Company may request a copy of a valid passport, national identity card, driving licence or another government-issued identification document. Such documentation may be used to confirm identity, prevent impersonation, investigate suspected fraud, verify age and maintain proper contractual or compliance records.
- **Address and residency information:** Hidalgo Holdings may collect residential addresses, mailing addresses, countries of residence, proof-of-address documents, utility bills or similar records where such information is required for account administration, identity verification, contractual documentation, invoicing or communication purposes.
- **Tax and national identification information:** Where relevant to the service, applicable law or a lawful request, the Company may collect a national identification number, tax identification number, country of tax residence or related information. Hidalgo Holdings will not collect such information merely for convenience where it is not reasonably necessary for a legitimate purpose.

1.2 Contact and communication information

- **Contact details:** Hidalgo Holdings may collect email addresses, telephone numbers, mobile numbers, postal addresses, social-media usernames and messaging-platform contact information so that the Company can communicate with the individual, provide customer support, deliver services, issue invoices, respond to enquiries and send important contractual or security notices.

- **Communication preferences:** The Company may record whether an individual prefers to be contacted by email, telephone, messaging application or another available communication channel. The Company may also maintain records of marketing preferences, subscription choices, language preferences and requests not to receive certain types of communications.
- **Authorised representative information:** Where a client appoints a lawful representative, accountant, lawyer, authorised family member or other representative, Hidalgo Holdings may collect information concerning that person and the authority granted to that person. The Company may request reasonable proof of the representative's authority before disclosing confidential information.

1.3 Account and client-portal information

- **Registration and login information:** Where a person creates an account through a Hidalgo Holdings website, portal or application, the Company may collect the individual's username, encrypted password, authentication information, login history and other information required to create, secure and administer the digital account.
- **Profile and service information:** The Company may maintain information about the services selected by the individual, the subscriptions purchased, the agreements accepted, the account preferences chosen, the profile information supplied and the history of the individual's relationship with Hidalgo Holdings.
- **Security and authentication information:** Hidalgo Holdings may collect security-question responses, authentication records, device-recognition information, failed-login attempts, password-reset requests and similar data for the purpose of protecting the client portal, detecting unauthorised access and maintaining the security of the Company's systems.

- **Customer-support records:** Information provided through help requests, complaints, live chat, email, messaging applications or telephone calls may be recorded and retained so that Hidalgo Holdings can investigate the matter, provide an appropriate response, maintain a record of client instructions and improve the quality of its customer service.

1.4 Trading profile and service-related information

- **Trading experience and knowledge:** Where relevant to an account-management, educational or subscription service, Hidalgo Holdings may ask the client to provide information concerning previous trading experience, knowledge of financial markets, familiarity with leverage, understanding of volatility and experience with particular financial instruments.

- **Risk profile and objectives:** The Company may request information concerning the client's general objectives, risk tolerance, preferred markets, expected account activity, preferred strategy and ability to withstand financial loss. This information may assist the Company in understanding the service requested, but it does not amount to a guarantee that any strategy or service is appropriate or suitable for the client.
- **Financial and economic profile:** Where reasonably required for security, compliance, fraud prevention or the administration of an account-management relationship, Hidalgo Holdings may request general information concerning occupation, employment status, industry, income source, source of wealth or source of funds. The Company will seek to limit such collection to information reasonably relevant to the identified purpose.

- **Client instructions and permissions:** Hidalgo Holdings may record the instructions, preferences, restrictions, account-management authority and other permissions given by the client. These records may be used to confirm the extent of the Company's authority, resolve disagreements and demonstrate what the Company was instructed or permitted to do.

1.5 Brokerage and managed-account information

- **Brokerage-account details:** Where the client has requested account-management or account-monitoring services, Hidalgo Holdings may collect the name of the client's brokerage provider, account number, account type, base currency, platform information and other details required to identify the account covered by the relevant service agreement.
- **Account performance information:** The Company may process account balances, account equity, available margin, used margin, profit and loss information, open positions, closed positions, trading history, performance summaries, drawdown information and other records necessary to provide account-management, account-monitoring or reporting services.
- **Strategy and risk-setting information:** Hidalgo Holdings may record the agreed trading strategy, position-size limits, risk settings, preferred instruments, account restrictions and other operational instructions relevant to the management or monitoring of the client-owned account.
- **Limited operational credentials:** Where operational access is necessary and expressly authorised, the Company may process trading-only credentials, read-only credentials, investor passwords, application programming interface information or other restricted access information. Hidalgo Holdings will seek to use the minimum level of access reasonably necessary to provide the agreed service.

- **Restricted financial credentials:** Hidalgo Holdings will not ordinarily request or store a client's online-banking password, bank PIN, payment-card PIN, unrestricted wallet recovery phrase, one-time withdrawal code or other credential that would allow the Company to withdraw or transfer funds from the client's personal financial account. Clients should not provide such information unless a lawful, documented and specifically authorised arrangement requires it.

1.6 Payment and billing information

- **Service-payment records:** Hidalgo Holdings may record the amount, date, currency, status and purpose of payments made for management services, subscriptions, courses, mentorship, administration or other agreed services. These records may be used for invoicing, accounting, reconciliation, taxation, dispute resolution and proof of payment.
- **Payment-method information:** Depending on the payment method used, Hidalgo Holdings may receive limited information such as a bank-transfer reference, payment-provider reference, account-holder name, billing address or the final digits of a payment card. Complete card information may be processed directly by the relevant payment-service provider rather than stored by Hidalgo Holdings.
- **Invoices and financial correspondence:** The Company may retain invoices, receipts, payment reminders, refund requests, disputed-payment records and related communications for legitimate business, accounting, contractual and legal purposes.
- **Nature of payments to Hidalgo:** Any financial information collected by Hidalgo Holdings in connection with these payments relates to service charges, fees and subscriptions. Such information does not indicate that Hidalgo Holdings has accepted the payment as trading capital, client money, an investment deposit or funds held in custody.

1.7 Technical and website information

- **Device and network information:** When an individual accesses the Company's website or client portal, Hidalgo Holdings or its service providers may collect an Internet Protocol address, device type, device identifier, operating system, browser type, browser version, language setting and other information relating to the technology used to access the service.
- **Website-usage information:** The Company may collect information about pages visited, links selected, session duration, referring pages, dates and times of access, portal activity, form submissions and other interactions with the website. This information may be used to understand website performance, identify technical errors and improve the user experience.
- **Security-related information:** Hidalgo Holdings may collect failed-login attempts, suspicious activity indicators, session information, access records, approximate technical location and other security information intended to protect the website, client accounts and Company systems from fraud, abuse and unauthorised access.
- **Cookie and analytics information:** Information may be obtained through cookies, pixels, analytics tools, local-storage technologies and similar systems, subject to the Company's Cookie Notice and the user's available choices.

1.8 Communication and recorded information

- **Written communications:** Hidalgo Holdings may retain emails, letters, chat messages, support tickets, social-media messages and other written communications exchanged with the individual. Such records may be used to provide services, maintain accurate client instructions, respond to complaints and establish evidence of the communications between the parties.

- **Telephone and video communications:** Where legally permitted and appropriately notified, Hidalgo Holdings may record or maintain notes of telephone calls, video meetings, online consultations or in-person discussions for security, service-quality, training, dispute-resolution and record-keeping purposes.
- **Feedback and survey information:** Information provided through surveys, reviews, feedback forms or market-research activities may be processed to improve services, understand user requirements and assess the performance of the Company's website, staff or service providers.

2. HOW WE COLLECT PERSONAL INFORMATION

Hidalgo Holdings may obtain personal information through the following methods.

- **Information provided directly by the individual:** Personal information may be collected when a person submits an online enquiry, completes an application, registers through the client portal, purchases a subscription, signs an agreement, provides account information, contacts customer support, participates in a training programme or communicates with the Company through any available channel.
- **Information generated during the provision of services:** Hidalgo Holdings may create or receive records concerning account performance, service usage, client instructions, correspondence, payment status, complaint history, subscription history and other information generated through the ongoing business relationship.
- **Information received from an authorised broker or provider:** Where the client has authorised the disclosure, the Company may receive information from the client's brokerage provider, payment provider, identity-verification provider or another service provider for the purpose of administering the requested service.

- **Information received from an authorised representative:** The Company may receive personal information from a person lawfully acting for the client, provided that Hidalgo Holdings is reasonably satisfied that the person has appropriate authority to provide the information or give instructions.
- **Information obtained from public sources:** Where reasonably necessary for identity verification, fraud prevention, legal compliance or the protection of the Company's rights, Hidalgo Holdings may obtain information from public registers, public websites, social-media profiles, corporate records or other lawfully accessible sources.

- **Information collected automatically:** Technical, security and usage information may be collected automatically through the Company's website, portal, server logs, cookies, analytics systems and cybersecurity tools.

Where UK data-protection law applies, individuals should be given meaningful information about the organisation processing their information, the purposes of processing, applicable retention periods and the parties with whom information may be shared.

3. PURPOSES FOR WHICH WE USE PERSONAL INFORMATION

Hidalgo Holdings may use personal information for the following purposes.

- **To establish and administer the business relationship:** The Company may use identity, contact, contractual and service information to respond to an enquiry, determine the service requested, prepare an agreement, register the client, maintain a client profile and administer the relationship between Hidalgo Holdings and the individual.
- **To provide account-management and account-monitoring services:** Where the client has entered into an appropriate agreement, personal and account-related information may be used to access, monitor, analyse or manage activity within the client-owned brokerage account in accordance with the authority granted by the client.

- **To provide educational and subscription services:** The Company may use contact, profile, payment and preference information to deliver courses, mentorship programmes, market updates, trading insights, daily signals, subscription content and other services purchased or requested by the individual.
- **To process service fees and subscriptions:** Payment and billing information may be used to issue invoices, confirm payments, maintain accounting records, reconcile subscriptions, investigate disputed transactions, process legitimate refund requests and collect amounts properly due under an agreement.
- **To communicate with clients and users:** Personal information may be used to send service notices, security warnings, account updates, contractual communications, subscription information, payment reminders, responses to enquiries and other messages necessary for the administration of the relationship.
- **To verify identity and protect security:** Information may be processed to confirm that the person communicating with Hidalgo Holdings is the correct individual, protect account access, prevent impersonation, detect fraud and investigate suspected unauthorised activity.
- **To comply with legal and regulatory obligations:** Where applicable, Hidalgo Holdings may use information to comply with a court order, lawful government request, tax obligation, accounting requirement, anti-fraud obligation, legal investigation or another binding requirement.
- **To establish and defend legal rights:** The Company may retain and use information where necessary to investigate a complaint, respond to a claim, recover unpaid charges, enforce an agreement, defend litigation, resolve a dispute or protect the Company, its staff, clients or property.
- **To improve the Company's operations:** Personal and technical information may be used to monitor service quality, identify website errors, improve client-support systems, train authorised staff, develop new features and conduct internal reviews.

- **To maintain business records:** Hidalgo Holdings may maintain records of contracts, instructions, payments, communications, account-management activities and complaints so that the Company can operate responsibly and demonstrate the basis upon which services were provided.

4. LEGAL BASES FOR PROCESSING

Depending on the circumstances and applicable jurisdiction, Hidalgo Holdings may process personal information on one or more of the following grounds.

- **Performance of a contract or steps requested before a contract:** Processing may be necessary to respond to a request, prepare a service arrangement, administer a subscription, provide account-management services, deliver educational content, process service payments or perform another obligation agreed with the individual.
- **Compliance with legal obligations:** Processing may be required so that Hidalgo Holdings can comply with applicable legal, accounting, tax, judicial, regulatory, security or record-keeping responsibilities.
- **Legitimate interests:** The Company may process personal information where reasonably necessary for legitimate business purposes such as providing and improving services, protecting systems, preventing fraud, managing client relationships, maintaining records, collecting unpaid fees and defending legal rights, provided that such interests are not improperly overridden by the individual's rights.
- **Consent:** Where consent is legally required or is the most appropriate basis, Hidalgo Holdings may seek the individual's voluntary, specific and informed agreement. Consent may be withdrawn, although withdrawal will not ordinarily affect processing that was lawfully completed before the withdrawal.

- **Legal claims and protection of rights:** Information may be processed where necessary for the commencement, exercise, investigation, defence or settlement of contractual, legal, regulatory or equitable claims.

The Company will not represent that consent is the only basis for processing where another lawful basis is more appropriate. It will also not rely upon a broadly worded consent statement as a substitute for proper transparency or another legal requirement.

5. CLIENT-OWNED BROKERAGE ACCOUNTS

Clients who use Hidalgo Holdings' account-management services may be required to open and maintain an account directly with an independent brokerage provider selected by or disclosed to the client.

- **Ownership of the brokerage account:** The account should remain in the client's own name, and the client remains responsible for maintaining the account, providing accurate information to the broker and complying with the broker's contractual requirements.
- **Holding of client trading capital:** The broker, rather than Hidalgo Holdings, is responsible for receiving, holding, safeguarding and processing deposits and withdrawals relating to the client's trading capital. Hidalgo Holdings does not become a custodian of client capital merely because it is authorised to handle trading activity within the account.
- **Broker privacy responsibilities:** The brokerage provider may collect identity documents, payment information, trading information and other personal data independently. Such processing is governed by the broker's own privacy policy, account agreement and legal obligations.
- **Information disclosed to Hidalgo:** Where the client authorises account-management services, the broker or trading platform may make information available to Hidalgo Holdings. The Company will use that information only for the agreed service, security, administration, dispute-resolution or other lawful purposes.

- **Independent status of brokerage providers:** A broker is an independent third party. Hidalgo Holdings is not responsible for every act, omission, privacy practice, security failure or data-processing decision of an independent broker, except to the extent that responsibility cannot legally be excluded.
- **No regulatory endorsement:** The authorisation or regulation of a brokerage provider does not automatically mean that Hidalgo Holdings is authorised, regulated or endorsed by the same authority. Hidalgo Holdings will not rely upon the broker's regulatory status as evidence of regulatory approval of Hidalgo's own activities.

6. COOKIES AND SIMILAR TECHNOLOGIES

The Hidalgo Holdings website may use cookies and similar technologies to operate, protect and improve its digital services.

- **Strictly necessary cookies:** Certain cookies may be required to maintain secure login sessions, authenticate users, remember security choices, prevent fraud, process requested functions or maintain the technical operation of the website. Disabling such cookies may prevent important parts of the website or client portal from operating correctly.
- **Preference cookies:** These cookies may remember choices concerning language, location, display settings, communication preferences or other user-selected options so that the website can provide a more consistent experience.
- **Analytics and performance cookies:** Subject to applicable consent requirements, Hidalgo Holdings may use analytics cookies to understand how visitors use the website, identify popular pages, measure website performance and detect technical problems.
- **Advertising and marketing cookies:** Where such technologies are used, they may assist with campaign measurement, audience analysis or the delivery of relevant advertising. Hidalgo Holdings will seek appropriate consent before using non-essential marketing technologies where consent is legally required.

- **Cookie choices:** Users may manage cookies through the Company's cookie-consent system or through browser settings. Removing or blocking cookies may affect website functionality and may require the user to re-enter preferences or login information.

For UK users, organisations must provide clear information concerning cookies and provide an appropriate means of consent for cookies that are not strictly necessary for the requested website service.

7. INFORMATION SHARING AND DISCLOSURE

Hidalgo Holdings does not sell or rent personal information to unrelated parties for their independent use.

The Company may disclose personal information in the following circumstances.

- **Brokerage providers:** Relevant account and identity information may be shared with the client's selected or authorised broker where the disclosure is reasonably necessary to establish, maintain, support or manage the client-owned account.
- **Payment providers and banks:** Payment-related information may be shared with banks, card processors, payment gateways, wallet providers or other payment-service providers where necessary to receive service fees, process subscriptions, confirm transactions or investigate payment disputes.
- **Technology and hosting providers:** Personal information may be processed by website hosts, cloud-storage providers, portal developers, cybersecurity providers, email providers, communication platforms and analytics providers assisting Hidalgo Holdings with its business operations.
- **Identity-verification and fraud-prevention providers:** Where reasonably required, information may be disclosed to a provider assisting with identity verification, document authentication, security monitoring or fraud prevention.

- **Professional advisers:** Information may be shared with lawyers, accountants, auditors, tax advisers, consultants and other professional advisers where they require access to provide advice or support to Hidalgo Holdings.
- **Government and legal authorities:** The Company may disclose information where required by law, court order, lawful investigation, regulatory requirement, tax request or another legally binding demand issued by a competent authority.
- **Protection and enforcement purposes:** Information may be disclosed where reasonably necessary to investigate fraud, prevent misuse of services, protect the Company's systems, enforce contractual rights, recover unpaid charges or establish, exercise or defend a legal claim.
- **Corporate transactions:** Where Hidalgo Holdings is involved in a merger, restructuring, financing, acquisition, sale or transfer of all or part of its business, relevant information may be disclosed to professional advisers, potential buyers, investors or successor organisations subject to appropriate confidentiality and legal safeguards.
- **Disclosure authorised by the individual:** Information may be shared with a family member, representative, adviser or another person where the individual has given valid authority and Hidalgo Holdings is reasonably satisfied as to that authority.

Hidalgo Holdings will seek to disclose only the information reasonably necessary for the relevant purpose. Where a third party processes information on behalf of the Company, Hidalgo Holdings will seek appropriate contractual, confidentiality and security protections.

8. DATA SECURITY AND CONFIDENTIALITY

Hidalgo Holdings will implement reasonable administrative, organisational and technical measures intended to protect personal information from unauthorised access, accidental loss, unlawful disclosure, alteration, misuse, destruction or theft.

- **Access restrictions:** Access to personal information will be limited to employees, officers, contractors, advisers and service providers who reasonably require access for an authorised purpose. Such persons may be subject to confidentiality and data-protection obligations.
- **Technical safeguards:** Depending on the nature of the system and information, Hidalgo Holdings may use secure website connections, password encryption, multi-factor authentication, access controls, firewalls, malware protection, monitoring systems, backups and regular software updates.
- **Staff and contractor responsibilities:** Persons authorised to handle personal information are expected to use such information only for legitimate Company purposes and to take reasonable precautions against unauthorised disclosure.
- **Account credentials:** The Company will seek to limit account access to the minimum level reasonably necessary to perform the relevant service. Clients should use trading-only, investor, read-only or restricted-access credentials wherever such options are available.
- **Client security responsibilities:** Clients are responsible for maintaining secure devices, protecting their passwords, enabling available security features and notifying Hidalgo Holdings promptly if they suspect that their credentials or accounts have been compromised.
- **Security incidents:** Where Hidalgo Holdings becomes aware of a suspected personal-data breach, the Company will assess the matter, take reasonable containment and recovery measures and make notifications where legally required.

No method of electronic communication, internet transmission or data storage can be guaranteed to be completely secure. Hidalgo Holdings does not provide an absolute guarantee that a data breach, cyberattack or security incident can never occur. However, the Company will take reasonable steps appropriate to the nature of the information and the risks involved.

9. DATA RETENTION

Hidalgo Holdings will retain personal information only for as long as reasonably necessary for the purposes for which the information was collected or for another lawful and compatible purpose.

- **Duration of the client relationship:** Information may be retained throughout the period in which the individual uses the Company's services, maintains an active subscription, communicates with the Company or remains subject to an account-management agreement.
- **Contractual and legal records:** Agreements, instructions, account reports, invoices, payment records and important communications may be retained after the relationship ends where necessary to demonstrate the services provided, enforce contractual rights, respond to disputes or comply with legal obligations.
- **Complaint and dispute information:** Information relating to complaints, investigations, payment disputes, suspected fraud, litigation or other claims may be retained for as long as reasonably necessary to resolve the matter and protect the Company's legal position.
- **Security and fraud-prevention information:** Certain records may be retained where necessary to prevent repeated fraud, block unauthorised users, maintain system security or protect clients and the Company from misuse.
- **Marketing-suppression information:** Where a person unsubscribes or objects to marketing, Hidalgo Holdings may retain limited information on a suppression list to ensure that the person's request continues to be respected.
- **Secure deletion and anonymisation:** When the Company no longer has a lawful or legitimate reason to retain identifiable information, it may securely delete, destroy or anonymise that information.
- **Backup and archived information:** Information contained in secure backups or technically restricted archives may not always be capable of immediate deletion. In such cases, the information may be isolated from ordinary use and deleted when the backup is securely replaced or destroyed.

Hidalgo Holdings will not retain personal information indefinitely merely because storage is available or because the information may possibly become useful at an unspecified future time.

10. MARKETING COMMUNICATIONS

Subject to applicable law and the individual's communication preferences, Hidalgo Holdings may send information concerning its services, educational programmes, subscriptions, market content and promotional offers.

- **Types of marketing communication:** Marketing information may include market updates, educational materials, trading insights, course announcements, subscription offers, service announcements, promotional campaigns and information about new Company services.
- **Consent and lawful permission:** Where consent is required, Hidalgo Holdings will seek appropriate permission before sending electronic marketing. Where applicable law permits communication with an existing customer about similar Company services, Hidalgo Holdings may rely on that permission only where the applicable conditions have been satisfied.
- **Unsubscribe rights:** Marketing emails and similar messages will provide a reasonable method through which the recipient may unsubscribe or object. The Company will process valid opt-out requests within a reasonable period.
- **Service communications:** Unsubscribing from marketing will not prevent Hidalgo Holdings from sending necessary communications relating to account security, payment status, contractual changes, subscriptions, legal notices, client support or the administration of an active service.

For UK recipients, electronic marketing to individuals generally requires consent unless a limited existing-customer exception applies. The sender must identify itself and provide a valid means of opting out.

11. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Hidalgo Holdings operates online and may use brokers, hosting providers, cloud services, payment providers, communication platforms and professional advisers located in different countries.

As a result, personal information may be stored in or accessed from a country other than the country in which the individual resides.

- **Use of overseas service providers:** Personal information may be processed by an overseas provider where that provider supplies technology, hosting, payment, brokerage, communication, analytics, professional or security services required by Hidalgo Holdings.
- **Appropriate safeguards:** Where legally required, the Company will seek to use appropriate contractual arrangements, recognised transfer mechanisms, binding obligations, consent or another lawful method to protect information transferred internationally.
- **Contractual necessity:** Information may be transferred where reasonably necessary to perform an agreement requested by the client, including where the client has chosen a broker or service provider operating in another country.
- **Legal claims and obligations:** International processing may take place where necessary to comply with a legal obligation, respond to a lawful authority, protect vital interests or establish, exercise or defend legal claims.
- **Differences between jurisdictions:** Privacy and data-protection standards may vary between countries. Hidalgo Holdings will not intentionally transfer personal information merely for the purpose of avoiding legal obligations applicable to the Company.

Sri Lanka's 2025 amendment addresses cross-border data flows and requires controllers and processors to comply with applicable processing obligations and use instruments or recognised conditions where relevant.

12. INDIVIDUAL PRIVACY RIGHTS

Subject to applicable law, exemptions, verification requirements and the circumstances of the request, an individual may have the following rights.

- **Right to receive information:** An individual may have the right to receive clear information concerning what personal information is collected, why it is processed, how long it is retained and the categories of recipients with whom it may be shared.
- **Right of access:** An individual may request confirmation as to whether Hidalgo Holdings processes personal information relating to that person and may request access to or a copy of qualifying information.
- **Right to correction:** Where personal information is inaccurate, incomplete or outdated, the individual may request that Hidalgo Holdings correct or complete the relevant information.
- **Right to withdraw consent:** Where processing is based upon consent, the individual may withdraw that consent. Withdrawal will not ordinarily affect the lawfulness of processing completed before the withdrawal.
- **Right to erasure or deletion:** An individual may request deletion of personal information where the legal conditions for erasure are satisfied. This right may be limited where Hidalgo Holdings must retain information for legal, contractual, security, accounting or claim-related purposes.
- **Right to restrict processing:** In qualifying circumstances, an individual may request that Hidalgo Holdings temporarily restrict how specified personal information is used while an accuracy, objection or legal issue is considered.
- **Right to object:** An individual may object to processing carried out on certain grounds, including direct marketing and, in appropriate circumstances, processing based on legitimate interests.
- **Right to data portability:** Where applicable, an individual may request that certain information provided to Hidalgo Holdings be supplied in a structured, commonly used and machine-readable format or transferred to another organisation where technically possible.

- **Rights relating to automated decisions:** Where a significant decision is made solely through automated processing, an individual may have the right to request information, object or seek meaningful human review, subject to applicable law.
- **Right to complain or appeal:** An individual may submit a privacy complaint to Hidalgo Holdings and may also have the right to approach or appeal to a competent data-protection authority.

Before responding to a request, Hidalgo Holdings may ask for reasonable evidence of identity or authority. This is intended to prevent personal information from being disclosed, corrected or deleted at the request of an unauthorised person. Under Sri Lanka's 2025 amendment, a controller receiving a qualifying written data-subject request must generally inform the individual in writing, without undue delay and within one month, whether the request has been granted or refused. In qualifying cases, the period may be extended by up to a further two months, with notice to the individual, and appeal rights may be available in relation to certain refusals.
Requests may be submitted to:
Email: support@hidalgoholdings.com
Subject: Personal Data Request

13. THIRD-PARTY WEBSITES AND SERVICES

The Hidalgo Holdings website, emails, client portal, social-media pages or subscription content may contain links to brokerage providers, payment processors, communication platforms, educational resources, social-media websites or other third-party services.

- **Independent privacy practices:** Third parties may collect and process personal information according to their own privacy policies, terms and legal obligations. Hidalgo Holdings does not control every privacy decision made by an independent third party.
- **Responsibility for reviewing policies:** Individuals should review the privacy policy and security information of each external website, broker, payment provider or service before submitting personal information or opening an account.

- **No automatic endorsement:** The inclusion of a link or reference to a third-party service does not necessarily constitute an endorsement, guarantee or acceptance of responsibility for that provider's security, financial condition, privacy practices or services.
- **Separate data controllers:** Where a brokerage provider, payment processor or other third party independently determines how and why personal information will be processed, that organisation may operate as a separate controller responsible for its own processing.

Hidalgo Holdings will not be responsible for an independent third party's unlawful processing except where responsibility arises from Hidalgo Holdings' own acts or omissions and cannot legally be excluded.

14. CHILDREN'S PRIVACY

Hidalgo Holdings' account-management, trading, subscription and related financial-market services are intended only for persons who are at least 18 years of age.

- **No intentional collection from minors:** Hidalgo Holdings does not knowingly invite minors to enter into managed-account agreements, provide brokerage-account access or purchase services intended for adult financial-market participants.
- **Age verification:** The Company may request proof of age where it has reasonable grounds to believe that an individual may be under 18 or where age verification is otherwise necessary.
- **Removal of children's information:** Where Hidalgo Holdings discovers that a minor has provided personal information without valid authority or appropriate consent, the Company may suspend the relevant registration and take reasonable steps to delete the information where legally and technically appropriate.
- **Public educational content:** The availability of general educational information on the Company's website or social-media pages does not amount to an invitation for minors to engage in speculative trading or account-management services.

15. AUTOMATED PROCESSING AND PROFILING

Hidalgo Holdings may use limited automated tools to support website security, fraud prevention, authentication, technical monitoring, analytics and preliminary risk identification. The Company does not ordinarily intend to make decisions that produce legal or similarly significant effects upon an individual solely through automated processing without appropriate human involvement. Where Hidalgo Holdings introduces automated decision-making that has a significant effect on an individual, the Company will provide additional information and implement any review, objection or transparency safeguards required by applicable law.

16. PRIVACY COMPLAINTS

An individual who believes that Hidalgo Holdings has collected, used, disclosed, retained or secured personal information improperly should first submit a written complaint to the Company. The complaint should include the individual's name, contact information, a clear description of the issue, relevant dates and any supporting documents reasonably necessary to investigate the concern. Hidalgo Holdings may request further information or reasonable proof of identity before discussing confidential information.
The Company will:

- Acknowledge the privacy complaint within the period required by applicable law or, where no period is prescribed, within a reasonable time.
- Conduct a reasonable review of the facts, systems, communications and persons relevant to the complaint.
- Provide a written response explaining the outcome or the additional steps required, subject to legal restrictions and the rights of other individuals.
- Take appropriate corrective action where the Company determines that an error, unauthorised disclosure or other privacy failure has occurred.

UK organisations are subject to a statutory data-protection complaints-handling requirement under the Data (Use and Access) Act 2025 from 19 June 2026.

Privacy complaints may be submitted to:
Hidalgo Holdings (Private) Limited
Email: support@hidalgoholdings.com
Subject: Privacy Complaint

17. CHANGES TO THIS PRIVACY POLICY

Hidalgo Holdings may review and amend this Privacy Policy from time to time to reflect changes in its services, website, technology, security practices, third-party providers, business operations or legal obligations.
The revised version will be published on the Company's website with an updated revision date. Where a material amendment significantly changes the way existing personal information is processed, Hidalgo Holdings will take reasonable steps to provide additional notice and, where legally required, obtain new consent or identify another appropriate legal basis before commencing the changed processing. Continued use of the website or services after publication of a revised Privacy Policy may constitute acknowledgement that the revised Policy has been made available. However, continued use will not by itself create valid consent where applicable law requires a specific, voluntary and informed opt-in.

18. CONTACT INFORMATION

Questions, requests, objections, corrections, withdrawals of consent and complaints concerning this Privacy Policy or the handling of personal information may be submitted to:

Hidalgo Holdings (Private) Limited
Company Registration Number: PV00279213
Email: support@hidalgoholdings.com
Website: www.hidalgoholding.com

Privacy Contact or Data Protection Officer:
[Details of the designated person responsible for privacy and data protection matters may be obtained by submitting a written request support@hidalgoholdings.com]

UK Representative:
[Where applicable, the contact details of Hidalgo Holdings' duly appointed UK representative may be obtained upon written request by contacting support.uk@hidalgoholdings.com.]

USER ACKNOWLEDGEMENT

By accessing the Hidalgo Holdings website, registering through the client portal, purchasing a subscription, entering into a service agreement or otherwise using the Company's services, the individual acknowledges the following:

- The individual acknowledges that Hidalgo Holdings does not request the individual to transfer trading or investment capital to the Company and that payments made directly to Hidalgo Holdings are limited to properly disclosed service fees, management charges, educational fees, administrative charges and subscription payments.
- The individual understands that any trading capital used in connection with an account-management service should remain within an account opened and maintained in the client's own name with an independent third-party brokerage or financial-service provider.

- The individual acknowledges that Hidalgo Holdings may process account, trading and performance information where the client has expressly authorised the Company to monitor, handle or manage activity within the client-owned account.
- The individual understands that providing account access does not transfer legal or beneficial ownership of the brokerage account or trading funds to Hidalgo Holdings and does not make Hidalgo Holdings the custodian or deposit holder of the client's capital.
- The individual acknowledges that independent brokers, payment providers, technology providers and other third parties process information under their own privacy policies and legal responsibilities.
- The individual acknowledges that Hidalgo Holdings may retain personal information after the service relationship ends where retention is reasonably necessary for legal, contractual, accounting, security, fraud-prevention, complaint-handling or dispute-resolution purposes.
- The individual acknowledges that the Company's liability and obligations concerning personal information remain subject to applicable law and that nothing contained in this Privacy Policy is intended to exclude an individual right or Company responsibility that cannot legally be excluded.

Hidalgo Holdings (Private) Limited
Company Registration Number: **PV 00279213**
Privacy Policy Version: 1.2
Last Revised: **27 July 2026**