

# **BLACKWELL GLOBAL INVESTMENT (CAMBODIA) CO., LTD**

## **PRIVACY POLICY**

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Blackwell Global Investment (CAMBODIA) CO., LTD, Company Number 00021362, is a Private Limited Company registered in Cambodia, Phnom Penh, with its registered office at No. 48, Mao Tse Toung Blvd, Sangkat Boeung Trabek, Khan Chamkarmon, Phnom Penh, Cambodia. Blackwell Global Investment (Cambodia) Co., Ltd (hereafter “Blackwell Global” or the Company”) is authorised and regulated by the Securities and Exchange Commission of Cambodia (“SECC”) under Derivative Broker Licence Number 005.

This Privacy Policy (hereafter “Policy”) outlines how Blackwell Global Investments (Cambodia) Co., Ltd (hereafter “Blackwell Global” or the “Company”) collects, uses, manages and discloses your personal information, and ensures that it remains confidential and secure. Your use of the Company’s website(s) constitutes acceptance of the terms of this Policy.

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes, and any amendments to this Policy will be incorporated in an updated version on this page. Your subsequent use of the website constitutes acceptance of those changes. Any information we hold will be governed by our most recent Privacy Policy.

### 1. Use of Personal Information

Blackwell Global needs to collect certain personal information to be able to offer its range of financial products and services to its Clients.

The Company collects and maintains personal information of the Client, through the use of the application and other types of forms, and through active use of the Client’s trading account. The type of information may include (but is not limited to) name, address, date of birth, contact details, employment and income, transaction history, areas of the website used and visited and links to and from third party websites. Blackwell Global may also be required to collect and maintain information from external sources, such as credit reference and identity verification agencies. Periodically we may ask you to voluntarily provide us with information for our marketing or survey purposes.

Blackwell Global will use your information for the purpose of opening and maintaining an account, confirming your identity, managing your profile and trading account and to enable us to provide you with the products and services that you have requested from us. Unless you have advised us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new products and services which we consider suitable for you.

### 2. Disclosure of Information

In the standard operation of our business, we may disclose your personal information to the following (who may be within or outside of Cambodia):

- our associated companies
- our third party service providers and professional advisors
- credit agencies
- any organizations or person expressly instructed by you
- any relevant regulatory, governmental or law enforcement authority as required by law
- third parties necessary to provide the products and services as requested by you

Blackwell Global requires non-affiliated companies who handle or obtain personal information as service providers to acknowledge the confidentiality of the received information, and to undertake to respect any individual’s right to privacy and comply strictly with the Policy.

### 3. Security of Information

The privacy and confidentiality of your personal information is of fundamental importance to us. We take all appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data and personal information.

We restrict access to personal information to employees who need to know the specific information in order to operate, develop or improve our services. These individuals are bounded by confidentiality and will be subject to penalties if they fail to meet these obligations.

### 4. Your Rights

You are able to obtain a copy of any personal information which we hold concerning you and for you to advise us of any perceived inaccuracy.

You may request at any time that we amend, update or (subject to our necessary legal, regulatory and business requirements) delete personal information which we hold concerning you. Please contact us at [info@blackwellglobal-kh.com](mailto:info@blackwellglobal-kh.com) to effect the relevant changes on your behalf.

### 5. Collection of Personal Data

#### Cookies

When using the Company’s websites, we may use cookies to collect information. A cookie is a small data file that is stored on

your computer, for the purpose of making it easier for you to navigate the website by for example; remembering your IDs, passwords and viewing preferences, thus allowing you to visit member-only areas of the website without logging in again. You can set your web browser to inform you when cookies are enabled, or to disable cookies. If you do not wish to receive cookies, most web browsers will permit you to decline/disable cookies and in most cases will still allow you complete access to our websites.

#### **Tracking Systems**

Tracking systems used on the Company's website(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits, etc. This information is obtained in order to improve the content of the Company's website(s) and may also be used to contact you, through any appropriate means, and provide you with any information the Company believes to be useful to you.

#### **6. Legal disclaimer**

Blackwell Global reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's Website(s) that the Company does not have access to or control over. Blackwell Global will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious.

#### **7. Changes to the Privacy Policy**

Blackwell Global reserves the right to change or amend the Privacy Policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this Policy, we will notify you by email or by means of a notice on our website. The latest and prevailing version of this Policy will be at all times available at [www.blackwellglobal-kh.com](http://www.blackwellglobal-kh.com).

Any revised Policy will be effective immediately upon posting on our website(s).