



CENTRINO CAPITAL LTD

PRIVACY POLICY

LATEST UPDATED IN OCTOBER 2025

The services provided on www.centrinocapital.com are provided by Centrino Capital Ltd., a company incorporated under the laws of Saint Lucia, with license number 2025-00708, regulated by the Financial Services Regulatory Authority (FSRA) Saint Lucia as a trading broker for over-the-counter derivatives contracts and foreign exchange spot markets and trading broker in the international markets.

Over-the-counter margined derivative contracts including contracts for difference and spot foreign exchange are complex instruments. They come with a high risk of losing money rapidly due to leverage. You should understand how these products work, and whether you can afford to incur losses and have the appropriate risk appetite. We recommend you seek professional advice before investing.

1. Welcome to Our Privacy Policy

At Centrino Capital Ltd (“Centrino Capital,” “the Company,” “we,” “us,” or “our”), we are committed to protecting your privacy and ensuring your personal information is handled with care and transparency.

This Privacy Policy ("Policy") explains how we collect, use, store, and share your personal data when you:

1. Visit our website at www.centrinocapital.com (the “**Website**”)
2. Use any of our services
3. Apply for or engage with any of our investment products or offerings

This Policy applies to the handling of personal data from:

- i. Clients
- ii. Prospective clients
- iii. Visitors to our Website

We are committed to managing your data in a way that is secure, transparent, and fully compliant with applicable data protection and privacy laws.

Please note: This Policy does not apply to third-party websites or services that may be linked from our website. We encourage you to review the privacy policies of those external sites separately.

2. DEFINITIONS

a. For the purposes of this Policy:

(a) Cookies: Small data files stored on your device’s hard drive or memory. These help us

enhance your experience by showing which parts of our website and services are most frequently used and tracking visit counts. To learn more about cookies and how to manage or disable them, please refer to the link provided.

(b) Log files: Records of activity on the Website that collect information such as your IP address, browser type, Internet service provider, referring and exit pages, and the date and time of your visit.

(c) Personal data: Any information that can directly or indirectly identify an individual, either on its own or when combined with other data—such as your name, ID number, or location details.

(d) Processing: Any action taken with respect to personal data, including but not limited to collecting, recording, organizing, storing, modifying, retrieving, using, sharing, or deleting that data.

(e) Web beacons: Small electronic files embedded in emails or on the Website. These help us deliver cookies, monitor visits, and evaluate the effectiveness of our communications and marketing campaigns.

3. Your Personal Data: What We Collect and Why

a. At Centrino Capital Ltd, we collect and process certain personal and financial information to comply with regulatory obligations, evaluate your application, deliver our services, and support your ongoing relationship with us.

b. When you apply to open an account with us, you will be required to complete an application form and provide specific personal information. By submitting this form, you consent to our collection and use of your data to:

- i. Evaluate your application
- ii. Comply with legal and regulatory requirements
- iii. Contact you regarding our services or relevant updates

c. We may collect a wide range of personal and financial data, including (but not limited to):

- i. Personal Identifiers:
 - a) Full name, residential address, email, and phone number
 - b) Date and place of birth, nationality, and citizenship
 - c) Gender and other identification data
- ii. Financial & Account-Related Information:
 - a) Income, source of funds, assets, liabilities, and tax status

- b) Bank account details, credit card numbers, and financial statements
- c) Trading account details, balances, transaction history, and inquiry logs
- d) Investment preferences and objectives
- iii. Due Diligence & Regulatory Information:
 - a) Identity verification documents (e.g., passport, national ID, driver's license)
 - b) Tax Identification Number (TIN) and background checks
 - c) Politically Exposed Person (PEP) status
 - d) Proof of residency documents (e.g., utility bills, bank statements)
- iv. Other Data:
 - a) Employment and professional background (employer name, job title, etc.)
 - b) IP address and geolocation data
 - c) Trading experience and performance history
 - d) Signature and other authentication data
- d. Who This Applies To
 - i. We may collect and process data from:
 - ii. Website visitors
 - iii. Individuals using any service on our platform
 - iv. Current, former, or prospective clients
- e. We may also collect personal data related to individuals associated with corporate or institutional clients, such as:
 - i. Company directors, officers, or authorized representatives
 - ii. Shareholders, nominees, and ultimate beneficial owners (UBOs)
 - iii. Legal representatives, agents, or other authorised parties acting on a client's behalf

f. Minors

Our services are not intended for individuals under the age of eighteen. We do not knowingly collect personal data from minors, and if we become aware that such information has been provided, it will be deleted promptly.

If you are under eighteen, please do not use our services or submit any personal data.

If you suspect that a minor has submitted information to us, please contact us immediately at: infodesk@centrinocapital.com

4. How We Collect Your Personal Information

At Centrino Capital Ltd, we collect your personal information through a variety of interactions and channels as part of delivering our services and complying with applicable regulations. This may include information you provide directly when you visit our website, use our mobile applications, complete account or demo sign-up forms, subscribe to newsletters, or engage with our client support team during onboarding or ongoing communication.

We may also receive information about you from third parties where required for regulatory or compliance purposes, such as identity verification services, credit reference agencies, and similar institutions. If you connect with us via a third-party platform (such as LinkedIn or Facebook), you authorize us to access specific information from your account, based on your privacy settings and the platform's terms of use.

In the course of providing our services, we maintain records of your trading activity, including the types of products you trade, transaction outcomes, trading history, investment volumes, and preferences related to particular financial instruments. This allows us to better understand your profile and tailor our services accordingly.

From time to time, we may request additional personal information on a voluntary basis, for example, through surveys or market research initiatives. While you are not required to provide this information, choosing not to may limit our ability to provide certain features or respond to specific requests.

All forms of communication between you and Centrino Capital Ltd, such as phone calls, emails, in-person meetings, and other interactions, may be recorded or monitored. These recordings are the exclusive property of Centrino Capital Ltd and may be used as evidence of our business relationship. Please note that telephone calls may be recorded without prior notification or an audible tone, as permitted by applicable law.

5. Personal Information Collected Automatically

Personal Information Collected Automatically

- a. When you access or use our Services, we automatically collect information about you, including:
 - i. **Log Data:** Data related to your use of our services, such as browser type, app version, access times, pages visited, IP address, network identifiers, and the referring website before accessing our services.
 - ii. **Device Data:** Information about the device you use to access our services, including hardware model, operating system and version, unique device ID, and your mobile network provider.
 - iii. **Website Activity:** Records of your interactions on our website, including content you submit, account-related actions, and details of deposits, withdrawals, and transactions, such as amount, currency, time, and payment method used.
 - iv. **Location Data:** With your device's permission, we may collect precise geolocation information.
 - v. **Cookies and Tracking Tools:** Data collected through cookies stored on your device and other tracking tools like web beacons and log files, which help us analyze user behavior and improve your experience. For further information, please refer to our Cookies

Policy.

You can find out more about our use of cookies in our Cookies Policy.

6. How We Use Your Personal Information

a. We handle your personal information carefully, fairly, and transparently. Here's how and why we use your data:

i. To Provide Our Services (Contract Performance)

When you become our client, we need your personal information to deliver the investment products and services you request. This includes setting up and managing your trading account and keeping you informed about relevant services.

As part of this process, we must verify your identity to comply with legal requirements. This might involve checks by trusted third parties, such as credit or identity verification services. This helps us manage your account properly and offer you the best service possible.

We are also required by law to follow rules like Know Your Customer (KYC) and Customer Due Diligence (CDD), which means using your data to prevent fraud and other illegal activities.

ii. To Meet Legal Requirements

We must use your personal information to comply with laws and regulations. This includes verifying your identity, checking for anti-money laundering, keeping your data for required periods, and sharing information with regulators when necessary.

Providing your information is essential for us to work with you. If you don't share the necessary data, we won't be able to provide services or start a business relationship with you.

iii. With Your Consent

Sometimes, we'll ask for your permission to use your data, like sending you marketing messages about our products or services. You can change your mind and withdraw your consent at any time, but this won't affect any data processing done before you withdrew it.

iv. To Protect Legitimate Interests

We may use your data to support legitimate business activities, such as improving our services or ensuring security. We always make sure this is fair and respects your rights, and we won't use your information in ways that could harm you.

7. How we share your personal information

- a. We treat your personal information with the highest level of confidentiality and do not share it with third parties unless:
 - i. We are required to do so by applicable laws, regulations, or legal processes;
 - ii. There is a legal obligation or public interest in disclosing the information;
 - iii. It is necessary to support our legitimate business operations; or
 - iv. You have given us your explicit consent or made a request for such disclosure.

- b. When we do need to share your information, we take steps to ensure that the receiving party understands and respects the confidential nature of your data. Depending on the purpose, we may share your information with:
 - i. Regulatory or supervisory authorities;
 - ii. Identity verification providers or credit reference agencies;
 - iii. External auditors, legal advisors, or consultants;
 - iv. Our affiliates and trusted service providers who support our day-to-day operations.

We apply appropriate safeguards to ensure your data is handled securely and used only for the intended purpose.

- c. We may also share your personal information within Centrino Capital Ltd. and with other companies within our group structure, including current or future parent companies, subsidiaries, and entities under common ownership. This may include:
 - i. Our Associates and Trusted Partners- including third-party vendors who help us with administrative, financial, legal, insurance, IT, research, or other professional services;
 - ii. Business Introducers- individuals or organisations with whom we have established referral or commercial relationships;
 - iii. Operational Partners- such as payment processors, banking institutions, IT hosting providers, and credit reference agencies;
 - iv. Legal and Regulatory Bodies- including courts, tribunals, or government agencies, when required or allowed by law;
 - v. Authorized Third Parties- anyone you've explicitly instructed or permitted us to share your information with.

- d. If we share your information with our business partners, such as banks or payment providers, so they can carry out services on your behalf, they may retain that data to comply with their own legal or regulatory obligations. Additionally, certain third-party providers (such as credit reference agencies) may record checks performed on our behalf and use that data when providing similar services to other institutions.

- e. Please note that this Privacy Policy does not cover third parties who act as independent data controllers. Their handling of your personal information is governed by their own privacy policies.
- f. That said, we generally require any third party who processes your information on our behalf to:
 - i. Treat your data with confidentiality;
 - ii. Respect your privacy rights; and
 - iii. Comply with applicable data protection laws and the standards set out in this Privacy Policy.

8. Storage And Retention of Personal Information

At Centrino Capital Ltd, we are committed to protecting your personal information, whether you interact with us in person, over the phone, online, or through any other authorised official communication channel.

We retain your personal data only for as long as it is needed to fulfil the original purpose for which it was collected. This includes delivering our services, managing your account, and meeting our legal, regulatory, and business obligations.

All personal data is stored securely, either in electronic systems or paper-based formats with safeguards in place to prevent unauthorized access, loss, misuse, or alteration.

Once your information is no longer required, we will either:

- i. Securely delete it, or
- ii. Anonymise it so you can no longer be identified.

However, in certain situations, we are legally required to keep your information for longer, for example, under anti-money laundering (AML) regulations, we must retain certain records for at least five (5) years after the end of our business relationship or longer, if required by applicable law.

9. How We Keep Your Personal Information Secure

At Centrino Capital Ltd, protecting your personal information is a top priority. Whether you are registering on our website or using our services, your data is treated as confidential and securely managed.

When you log in to your account, you will need your unique username and password. It is your responsibility to keep these credentials private and not share them with anyone. This is essential to help prevent unauthorised access to your account.

All information classified as registered data, including personal details and financial activity

is stored securely and can only be accessed by authorised personnel using secure login credentials. Any data you send to us is protected through encrypted connections designed to safeguard against unauthorised access or interception.

Even personal information that is not directly linked to your online account is stored securely in password-protected systems and accessed only by authorised staff.

While we apply robust security protocols and industry best practices to protect your data, please note that no internet-based system can be entirely immune to threats. For this reason, Centrino Capital Ltd cannot be held responsible for any misuse of your personal information resulting from lost passwords, negligence, or malicious actions outside of our control.

We strongly recommend taking proactive steps to protect your credentials and notify us immediately of any suspicious activity on your account.

10. Marketing and your Personal Data

With your permission, for example, when you subscribe to our newsletter, we may send you updates about our latest products, services, and investment opportunities. These communications may be shared via email, phone, social media, or other channels you have agreed to.

We respect your preferences, and you are always in control. If at any point you no longer wish to receive marketing messages, you can:

- i. Click the “unsubscribe” link at the bottom of any email, or
- ii. Contact us directly at infodesk@centrinocapital.com

Please note: Unsubscribing will stop any future marketing communications, but it will not affect any messages sent before you withdrew your consent.

11. Cookies

Cookies are small files stored on your device that help improve your experience when using our website. Like many other websites, we use cookies to:

- i. Remember your preferences
- ii. Enable secure access to areas like your trading account
- iii. Help us understand how you interact with our content
- iv. Deliver relevant ads and promotions based on your interests

You can manage or disable cookies at any time through your browser settings. Please note, though, that turning off cookies may impact how certain features work, especially in secure

areas such as our trading platform.

We may also work with trusted third parties, like Google, to show you tailored ads across the internet based on how you have used our site in the past. If you would prefer not to see these ads, you can adjust your settings via Google's Ads Settings page.

For full details on the types of cookies we use and how they work, please refer to our Cookie Policy.

12. Your Rights

At Centrino Capital Ltd, we believe your personal data belongs to you. That is why we make it easy for you to access, update, or manage how your data is used. Here are your rights and how to exercise them:

i. Right to Access

You can ask us if we are using your personal data and if we are, we will send you a copy within 30 days of your request.

ii. Right to Correct Your Information

If anything, we hold about you is inaccurate or incomplete, you can ask us to fix it. We will also let anyone else we have shared your data with know about the update, where possible. To update your information, email us at infodesk@centrinocapital.com. We may need supporting documents to confirm the changes.

iii. Right to Delete Your Data ("Right to Be Forgotten")

You can request that we delete your personal information if:

- i. It is no longer needed for the original purpose
- ii. You have withdrawn consent (where applicable)
- iii. There is no legal reason for us to keep it

If we have shared your data, we will try to notify those parties and give you the list upon request, when allowed.

iv. Right to Restrict How We Use Your Data

You can ask us to pause using your personal data, for example, if you are disputing its accuracy or how we are using it. We may still store your data but will not process it further until the issue is resolved. We will let you know if this restriction is lifted.

v. **Right to Transfer Your Data (Data Portability)**

You can request a copy of the personal data you have given us in a structured, machine-readable format, or ask us to send it directly to another company (where technically possible).

vi. **Right to Object or Opt-Out**

If we use your data for our legitimate business interests, you can object. If there is no overriding legal reason for us to continue processing it, we will stop.

You can also withdraw your consent to marketing or other services at any time by emailing infodesk@centrinocapital.com. Please note: this may affect the services we can offer you going forward.

13. External Websites or Third-Party Links

For your convenience, our website may include links to third-party websites. These links are provided to give you access to additional information or services.

However, once you click on a link and leave our site, please be aware that we do not control the content, security, or privacy practices of those external websites.

This means:

- i. We are not responsible for how those sites handle your personal data.
- ii. These websites are not covered by our Privacy Policy.

We strongly recommend that you review the privacy policies of any third-party websites you visit to understand how they collect, use, and protect your information.

14. Contact Us

If you have any questions about this Privacy Policy, how we handle your personal information, or if you wish to exercise any of your legal rights mentioned above, please feel free to contact us at infodesk@centrinocapital.com. We're here to assist you.

15. Modification

We may occasionally update this Privacy Policy to reflect changes in laws, regulations, or how we manage your personal information. When we make significant updates, we'll post the latest version on our website. You can always find and review the most current version of this policy at any time on our site.

16. Legal Disclaimer and Limitation of Liability

We may need to share your personal information if required by law, or when it's necessary to protect our rights or comply with legal proceedings, court orders, or other official processes related to our website.



Please note that we are not responsible for any misuse or loss of personal data caused by cookies managed by third parties, as we do not control or have access to those cookies. Similarly, we cannot be held liable for any unauthorized or improper use of your personal information resulting from lost, misused, or mishandled passwords, whether this happens through negligence or malicious intent, regardless of how you contacted us.