



AENCO PRIVACY POLICY

This privacy policy ("Privacy Policy") explains and governs how Aenco Smartcap ("AENCO") collects, records, holds, uses, shares, discloses, processes, manages and protects information obtained from users (hereinafter "User", "you", "your" or "yours") through the AENCO website – www.aensmart.com (the "Site"). The terms "we," "us," and "our" refer to Aenco Smartcap Limited, the holding company of its wholly owned operating subsidiaries, such as Aenco SmartCap (Hong Kong) Limited, Aenco Limited, and its affiliates. When we ask for certain personal information from Users because we are required by law to collect this information or it is relevant for specified purposes. Any non-required information you provide to us is done so voluntarily. You decide whether to provide us with this non-required information; you may not be able to access or utilize all of our services if you choose not to. The security of your personal data is important to us. AENCO has safeguards in place to protect the personal data stored with us.

By using the Site, you consent to the data practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Site. On occasion, AENCO may revise this Privacy Policy to reflect changes in law or our personal data collection and use practices. If material changes are made to this Privacy Policy, the changes will be announced by posting on the Site. Your continued use of the Site following the posting of changes to this Privacy Policy. We will ask for your consent before using your information for any purpose that is not covered in this Privacy Policy.

The Site may contain links to other websites which are not maintained by us. This Privacy Policy only applies to the information collected by us through our websites and/or services and does not apply to third party websites and services that you may access through these links. When visiting these third-party websites, you should read their Privacy Policies, which will apply to your use of these websites.



INFORMATION AENCO COLLECTS

We want you to understand the types of information we collect when you register for and use AENCO's services:

Information you provide to us at registration

When you create an AENCO Account, you provide us with personal information that includes your identification and contact information (e.g. email address, name, and password).

Information we collect when authenticating User identity

To comply with global industry regulatory standards including Anti-Money Laundering (AML), Know-Your-Customer (KYC), and Counter Terrorist Financing (CTF), AENCO requires User accounts to undergo User identity authentication for both personal and enterprise accounts. This entails collecting formal identification.

Information we collect as you use our services

- a) Service Usage Information - Through your use of the AENCO platform, we also monitor and collect tracking information related to usage including but not limited to log information (such as browser type, access date and time, pages viewed, IP address and the page you visited before navigating to our online services) and device information (such as the hardware model, operating system and version, unique device identifiers and mobile network information); we may also collect location information (such as each time you access or use the AENCO platform or otherwise consent to the collection of this information, as well as information from cookies (we or our third-party partners may use cookies and web beacons or other technologies to collect and store this and other information about your visit to, or use of, our online services, while you may set up your web browser to block cookies from monitoring your Site visit). This information may be directly obtained by AENCO or through third party services. This service usage data helps us our systems to ensure that our interface is accessible for Users across the AENCO platform and can aid during criminal investigations.
- b) Transaction Information – For all personal and enterprise User accounts, we collect transaction information including deposit snapshots, account balances, trade history, withdrawals, order activity and distribution history. This transaction data is monitored for suspicious trading activity for User fraud protection, and legal case resolution.
- c) Information we collect from other sources - We may also collect information about you from additional online and offline sources including commercially available third-party sources. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.



WHY DOES AENCO COLLECT THIS INFORMATION:

To provide, maintain and improve our services

We use the information collected to deliver our services and verify User identity. We use the IP address and unique identifiers stored in your device's cookies to help us authenticate your identity and provide our service. Given our legal obligations and system requirements, we cannot provide you with services without data like identification, contact information and transaction-related information.

To protect our Users

We use the information collected to protect our AENCO platform, Users' accounts and archives. We analyze account and trading activity with the goal of detecting suspicious behaviour early to prevent potential fraud and loss of funds to bad actors.

To comply with legal and regulatory requirements

We respect the privacy and security of data you store with AENCO and comply with applicable laws and regulations, governmental requests, relevant industry standards and contractual obligations.

To measure site performance

We actively measure and analyze data to understand how our services are used. This review activity is conducted by our operations team to continually improve our AENCO platform's performance and to resolve issues with the User experience.

We continuously monitor our systems' activity information and communications with Users to look for and quickly fix problems.

To communicate with you

We use personal information collected, like an email address to interact with Users directly when providing customer support on a ticket or to keep you informed on log ins, transactions, and security. Without processing your personal information for confirming each communication, we will not be able to respond to your submitted requests, questions and inquiries. All direct communications are kept confidential and reviewed internally for accuracy.

To enforce our Terms of Use and other agreements

It is very important for us and our customers that we continually review, investigate and prevent any potentially prohibited or illegal activities that violate our Terms of Use. For the benefit of our entire User base, we carefully enforce our agreements with third parties and actively investigate violations of our posted Terms of Use. AENCO reserves the right to terminate the provision of service to any User found engaging in activities that violate our Terms of Use.



HOW DOES AENCO DISCLOSE USER DATA

We will not sell or trade your information unless we provide you with advance notice. We may share information about you as follows:

- a) with current and future AENCO partners, affiliates, subsidiaries and other companies under common control and ownership in the course of delivering our services to you;
- b) with affiliates, consultants, and other service providers when we believe it will enhance the services and products we can provide to you, or for legal and routine business reasons, so long as those parties agree to keep this information confidential;
- c) release information when its release is appropriate to comply with the law, enforce our Privacy Policy, Terms of Use, or protect our or others' rights, property or safety. This does not include Site hosting partners and other parties who assist us in operating our Site, conducting our business, or serving our Users;
- d) subject to Users' consent or direction, share aggregated or de-identified information, which cannot reasonably be used to identify you.

HOW DOES AENCO PROTECT USER DATA

AENCO has implemented a number of security measures to protect your information from loss, abuse, unauthorized access, alteration, disclosure or destruction. Please note that it is impossible to guarantee 100% secure transmission of data over the Internet nor method of electronic storage. As such, we request that you understand the responsibility to independently take safety precautions to protect your personal information.

If you suspect that your personal information has been compromised, especially account and/or password information, please immediately stop using your account and contact AENCO customer service at support@aensmart.com.

HOW DOES AENCO STORE USER DATA

The information that we collect from you may be transferred to and stored at a destination outside your country, in particular where counterparties to any of the service offered through our Site are based outside of your country. Your information may also be processed by staff operating outside of your country who works for us or for one of our suppliers. By submitting information to us, you agree to such transfer, storing or processing.

BUSINESS ACQUISITION OR TRANSFERS

If AENCO, or substantially all of its assets, were acquired, or in the unlikely event that AENCO goes out of business or enters bankruptcy, User information would be one of the assets that are being transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of AENCO may continue to use your personal information as set forth in this Privacy Policy.



CHILDREN UNDER THE AGE OF 18

AENCO is not intended or directed at individuals under the age of 18. Therefore, individuals under the age of 18 may not create an account or otherwise access or use our services.

YOUR CHOICES

We may provide you with tools and settings that allow you to access, correct, delete and modify information associated with your account.

You may also remove cookies stored from your computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of the Site.

SOCIAL SHARING FEATURES

Our Site may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the Privacy Policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

HYPERLINKS AND THIRD-PARTY SITES

This Site may contain links to other third party websites that may collect personal information about you, including through cookies or other technologies. If you link to another website, you will leave this Site and this Privacy Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

CHANGES TO THE PRIVACY POLICY

We may change this Privacy Policy from time to time to ensure that this Privacy Policy is consistent with any developments to the way we use your personal data, or any changes to the laws and regulations applicable to us. If we do, we will let you know by appropriate means, such as by posting the revised Privacy Policy on our Site with a new version from date. All changes will become effective when posted unless indicated otherwise.



CONTACT US

We are committed to respecting the freedoms and rights of all the Users who have placed their trust in our service. We provide Users with access to their personal identification information. Users may update or delete such information at any time on their discretion. We will not keep outdated or deleted information, unless we have to do so for legitimate business purposes or in accordance with legislative or regulatory requirements.

You have the right to request a copy of your information that we hold. Please submit a written application at support@aensmart.com.

If any of your information that we hold is incorrect, you can change it by contacting us at support@aensmart.com.

If you should have any questions or concerns regarding this Privacy Policy, or if you would like to file a Data Protection request, please contact us here: support@aensmart.com.



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