



Privacy Policy



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1. Introduction

- 1.1. Altum Ltd, a company duly incorporated and existing under the laws of the Republic of Seychelles, with company registration number 8434835-1, having its registered address at House of Francis, Room 302, Ile Du Port, Mahe, Seychelles, and licensed and regulated by the Seychelles Financial Services Authority (FSA) under Securities Dealer's Licence No. SD194, trading under the brand name Altum Brokers (hereinafter referred to as the "Company", "we", "us", or "our"), is committed to protecting your privacy and safeguarding your personal information.
- 1.2. The protection of personal data and the safeguarding of Clients' privacy are of fundamental importance to the Company. This Privacy Policy describes how we collect, process, store, and protect your personal information in accordance with the Seychelles Data Protection Act (2003), as well as the general principles of international data protection laws, including the EU General Data Protection Regulation (GDPR) where applicable. By using our website, opening an account, or otherwise engaging with us, you acknowledge and agree to the terms of this Privacy Policy.
- 1.3. The Company ensures that all processing of personal data is carried out lawfully, fairly, and transparently, and in full compliance with applicable legislation. This Policy applies to all existing and prospective Clients, former Clients, and visitors who access or use our websites, platforms, and services.

2. Who We Are And Data Controller

- 2.1. For the purposes of data protection law, Altum Ltd (Altum Brokers) acts as the data controller, meaning it determines the purposes and means of processing your personal data.



- 2.2. The Company collects and processes information only to the extent necessary to provide its investment and brokerage services, to comply with legal and regulatory requirements, and to maintain effective client relationships.
- 2.3. For any queries or requests regarding this Privacy Policy or the handling of your data, please contact us at: privacy@altumbrokers.com

3. Collection Of Personal Data

- 3.1. The Company collects personal data directly from Clients during the account registration process, through electronic forms, communications, and interactions via our website or trading platforms. We may also collect information from publicly available sources and third-party databases to verify or supplement the information provided.
- 3.2. The collection of personal data is essential to enable us to establish a contractual relationship with the Client and to perform our legal and regulatory obligations, including those relating to anti-money laundering (AML) and counter-terrorism financing (CTF) requirements.
- 3.3. Clients who choose not to provide the necessary personal data may be unable to open an account or receive our services. It is the Client's responsibility to ensure that all information provided remains accurate, complete, and up to date throughout the duration of the business relationship.
- 3.4. The Company understands the importance of protecting children's privacy. Our services are not intended for individuals under the age of 18, nor is our website designed for use by minors. We do not knowingly or intentionally collect personal information from children. If we become aware that such data has been collected inadvertently, we will delete it as soon as reasonably practicable.



4. Types And Purpose Of Personal Data Collected

The Company collects and processes various categories of personal data depending on the nature of the relationship with the Client and the services provided. The table below summarises the types of data collected and the purposes for which they are used:

Type of Data	Purpose of Processing
Identification details (name, gender, date of birth, nationality, ID or passport number).	To verify the Client's identity and comply with KYC, AML, and regulatory obligations.
Contact details (address, email, phone number).	To communicate with Clients regarding their account and our services.
Financial information and employment data.	To assess the appropriateness of our products and services and comply with regulatory requirements.
Proof of identity and address (utility bills, bank statements, photo ID).	For identity verification and compliance purposes.
Trading history, transaction records, and account activity.	To administer Client accounts, execute transactions, and comply with reporting obligations.
Technical data (IP address, device ID, browser type, cookies).	To ensure platform functionality, security, and optimisation of user experience.
Communication records (emails, chat transcripts, voice calls).	For client service, monitoring, dispute resolution, and regulatory audit purposes.

5. Use Of Personal Data

The Company processes personal data for legitimate business and regulatory purposes, which include but are not limited to:

- Establishing, managing, and maintaining Client relationships;
- Assessing Client suitability and appropriateness;

- Performing contractual and operational obligations, such as trade execution, deposits, and withdrawals;
- Meeting legal, regulatory, and compliance requirements;
- Managing and improving our website, systems, and services;
- Preventing fraud, money laundering, and other unlawful activities;
- Providing updates about our services, market information, and relevant changes;
- Sending promotional or marketing communications where consent has been obtained;
- Ensuring the security and integrity of our systems and Clients' accounts.

The Company may also process data to develop new products, enhance service quality, and improve user experience through analytics and aggregated data analysis.

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6. Sharing and Disclosure of Personal Data

In the course of performing our contractual and legal duties, the Company may share Clients' personal data with third parties, including but not limited to:

- **Service providers and business partners** assisting with IT, hosting, client onboarding, payment processing, and verification systems;
- **Regulatory authorities, law enforcement agencies**, or other competent bodies, where disclosure is required by law or regulation;
- **Auditors, consultants, and professional advisers** engaged by the Company;
- **Affiliated entities and group companies for compliance**, internal audit, and business continuity purposes.

All third parties with whom we share information are required to maintain the same level of data protection and confidentiality standards as the Company. Such parties may process personal data only in accordance with our written instructions and not for their own purposes.

In circumstances where personal data must be transferred outside Seychelles or the Client's country of residence, the Company ensures that appropriate safeguards are in place, such as the use of standard contractual clauses or equivalent measures in compliance with applicable data protection laws.

7. Cookies and Links to Other Websites

To enhance user experience and website functionality, the Company uses cookies and similar technologies. Cookies help us analyse web traffic, understand user preferences, and improve service quality. These cookies do not grant access to your device or personal files.



You can manage your cookie preferences at any time through your browser settings.

More detailed information is provided in our **Cookie Policy**, available on our website.

Our website may contain links to external websites or social media platforms. Please note that the Company does not control these sites and is not responsible for their privacy practices or content. We encourage Clients to review the privacy policies of any third-party websites they visit.

8. Confidentiality and Security of Personal Data

The Company treats all personal data with the highest degree of confidentiality and employs advanced technical and organisational measures to safeguard it.

These measures include data encryption, secure servers, firewalls, and restricted access to personal data on a need-to-know basis. All employees and third-party service providers who handle personal data are subject to strict confidentiality agreements.

The Company continuously reviews and updates its security systems to ensure the protection of personal data against unauthorized access, misuse, alteration, or destruction. In the event of a suspected data breach, affected Clients and relevant authorities will be notified promptly in accordance with applicable laws.

9. International Data Transfers

Due to the nature of our services, data may be transferred to and processed in jurisdictions outside the Republic of Seychelles. Whenever personal data is transferred internationally, the Company ensures that such transfers comply with data protection laws and that appropriate safeguards, such as contractual protections or regulatory approvals, are in place to protect the data.



10. Retention and Deletion of Personal Data

Personal data will be retained for as long as necessary to fulfil the purposes for which it was collected or to comply with legal and regulatory obligations.

In general, the Company will retain Client data for a period of **seven (7) years** after the termination of the business relationship, as required under applicable laws and anti-money laundering regulations.

After this period, data will be securely deleted or anonymized, unless retention is required by law or consented to by the Client.

11. Legal Basis for Processing

The Company processes personal data on the following lawful grounds:

- **Contractual necessity:** to perform our obligations under the client agreement;
- **Legal obligation:** to comply with applicable laws, regulations, and directives;
- **Legitimate interests:** for internal business functions, fraud prevention, service improvement, and client relationship management;
- **Consent:** where required for specific processing, such as marketing communications.

Where processing is based on consent, Clients have the right to withdraw consent at any time without affecting the lawfulness of prior processing.

12. Clients' Rights

Clients have the following rights under applicable data protection legislation:

- **Right to access** – to obtain a copy of the personal data held by the Company;
- **Right to rectification** – to request correction of inaccurate or incomplete data;



- **Right to erasure** – to request deletion of personal data where legally permissible;
- **Right to restriction** – to limit processing in certain circumstances;
- **Right to data portability** – to receive data in a structured, commonly used format;
- **Right to object** – to object to processing for direct marketing or other legitimate reasons;
- **Right to withdraw consent** – where processing is based on consent.

To exercise these rights, Clients may contact us at privacy@altumbrokers.com. Proof of identity may be required to verify such requests.

13. Marketing Communications

The Company may use personal data to inform Clients about products, services, and promotional offers that may be of interest. Marketing communications are sent only where the Client has provided consent or where a legitimate interest exists.

Clients may withdraw consent or opt out of marketing communications at any time by clicking "unsubscribe" in any promotional email or by contacting support@altumbrokers.com.

14. Amendments to this Policy

The Company reserves the right to amend this Privacy Policy periodically to reflect changes in regulatory requirements, technological advancements, or internal practices.

The most current version of the Policy will be available on our website. Clients are encouraged to review this Policy regularly to remain informed of any updates that may affect them.



15. Contact Details

For questions, requests, or concerns regarding this Privacy Policy or your personal data, please contact us at:

Altum Brokers

House of Francis, Room 302, Ile Du Port, Mahe, Seychelles

privacy@altumbrokers.com