Privacy Policy - Hiove

Effective Date: March 15, 2023 **Last Updated:** September 28, 2024

1. General Information

This Privacy Policy ("Policy") describes how GallTek Global LLC, a company registered in Saint Vincent and the Grenadines, with address at Suite 204, Griffith Corporate Centre, Beachmont, Kingstown, Saint Vincent and the Grenadines, operating under the commercial brand "Hiove" ("we", "our", "Company" or "Hiove"), collects, uses, processes, stores and protects your personal information when you use our services through the website hiove.com and our trading platform.

1.1 Data Controller

GallTek Global LLC

Suite 204, Griffith Corporate Centre Beachmont, Kingstown Saint Vincent and the Grenadines Email: support@galltekglobal.com

1.2 Acceptance of this Policy

By using our services, registering an account or accessing our platform, you agree to the terms of this Privacy Policy and consent to the collection, use and processing of your personal information as described herein.

2. Information We Collect

2.1 Personal Identification Information

- Registration Data: Full name, email address, phone number, date of birth, nationality
- Identification Documents: Copy of passport, identity card, official identification documents
- Address Information: Complete residential address, proof of residence
- Financial Information: Banking details, payment methods used, transaction history

2.2 KYC (Know Your Customer) Documents

- Official photo identification documents
- Proof of address (utility bills)
- Information about ultimate beneficial owners (when applicable for legal entities)
- Management and ownership certificates (when applicable)
- Any additional documentation requested for verification

2.3 Trading and Account Information

- Transaction history and operations
- Account balance and financial movements
- Trading settings and preferences
- Communications through the support ticket system
- Live chat records on the platform

2.4 Technical and Usage Information

- IP addresses and geographical location data
- Device information: Type, model, operating system, unique identifiers
- Browsing data: Cookies, pages visited, session time
- Access logs: Login/logout times, platform activities
- Behavioral data: Trading patterns, usage frequency

2.5 Third-Party Information

- Data received from payment service providers
- Identity verification information from specialized agencies
- Information from introducing brokers (when applicable)

3. How We Use Your Information

3.1 Service Provision

- Create and manage your trading account
- Process transactions and financial operations
- Execute trading orders according to your instructions
- Provide technical support and customer service
- Maintain platform security and integrity

3.2 Legal and Regulatory Compliance

- **KYC Verification:** Confirm your identity and suitability
- Anti-Money Laundering (AML): Monitor suspicious transactions
- Tax Compliance: Fulfill tax reporting obligations
- Counter-Terrorism Financing: Verify sanctions lists
- Compliance with court orders and authority requests

3.3 Security and Fraud Prevention

- Detect suspicious activities: Multiple accounts, automated trading
- Monitor anomalous patterns: HFT, coordination between accounts
- Prevent unauthorized access to your account
- Investigate violations of terms of service
- Protect against market manipulation

3.4 Service Improvement

- Analyze platform usage for improvements
- Develop new features and functionalities
- Personalize user experience
- Optimize platform performance

3.5 Communication

- Send important notifications about your account
- Communicate changes in terms of service
- Respond to your support requests
- Provide platform updates

4. Legal Basis for Processing

We process your personal information based on the following legal bases:

4.1 Contract Performance

- Fulfillment of accepted Terms and Conditions
- Provision of requested trading services
- Processing of financial transactions

4.2 Legal Obligations

- Compliance with KYC/AML regulations
- Regulatory and tax reporting
- Cooperation with competent authorities

4.3 Legitimate Interests

- Platform security and fraud prevention
- Improvement of offered services

Protection of company rights and other users

4.4 Consent

- For marketing communications (when applicable)
- For non-essential cookies
- For specific processing requiring consent

5. Information Sharing

5.1 Third-Party Service Providers

We share information with trusted third parties that provide services on our behalf:

- Payment processors for financial transactions
- Identity verification providers for KYC
- Hosting and technology services for infrastructure
- Analytics and security providers for platform protection

5.2 Legal Obligations

We may disclose information when required by:

- Court orders or warrants
- Regulatory authority investigations
- Compliance with applicable laws
- Protection of company legal rights

5.3 Introducing Brokers

When applicable, we share limited information with introducing brokers according to specific agreements and always within legal limits.

5.4 Corporate Transfers

In case of merger, acquisition or asset sale, your information may be transferred as part of the transaction, always with adequate protections.

6. International Transfers

6.1 Data Location

Your data may be processed on servers located in different jurisdictions, including Saint Vincent and the Grenadines and other countries where our service providers operate.

6.2 Transfer Protections

We implement adequate safeguards for international transfers:

- Standard contractual clauses
- Adequacy certifications
- Other recognized protection measures

7. Data Security

7.1 Technical Measures

- Encryption: Sensitive data is encrypted in transit and at rest
- Access controls: Restricted access based on need-to-know principle
- Monitoring: Intrusion detection and suspicious activity systems
- Secure backups: Regular and protected backup copies

7.2 Organizational Measures

- Employee training in data protection
- Internal policies for information security
- Regular security audits
- Structured incident response

7.3 Security Limitations

While we implement robust security measures, no system is 100% secure. You also have responsibility to:

- Keep your login credentials secure
- Not share access information
- Report suspicious activities immediately

8. Data Retention

8.1 Retention Period

- During contractual relationship: We maintain your data while your account is active
- After termination: Data is retained for a minimum of 7 years after account closure
- Legal obligations: Some data may be retained for longer periods as required by law

8.2 Retention Criteria

We determine retention periods based on:

Legal and regulatory requirements

- Legitimate operational needs
- Types of data and their sensitivity
- Risks associated with processing

8.3 Secure Disposal

When no longer needed, data is securely disposed of using methods that prevent recovery.

9. Your Rights

9.1 Right of Access

You may request information about:

- What personal data we process about you
- The purposes of processing
- The categories of recipients
- The retention period

9.2 Right of Rectification

You may request correction of incorrect or incomplete personal data.

9.3 Right of Erasure

Under certain circumstances, you may request deletion of your personal data, subject to:

- Legal retention obligations
- Legitimate company interests
- Contractual needs

9.4 Right of Restriction

You may request restriction of processing in specific situations.

9.5 Right of Portability

When technically feasible, you may request transfer of your data to another service provider.

9.6 Right of Objection

You may object to processing based on legitimate interests, subject to demonstration of overriding legitimate grounds.

9.7 How to Exercise Your Rights

To exercise any of these rights:

• Email: support@galltekglobal.com

• **Ticket system:** Through the trading platform

Response time: Up to 30 days

10. Cookies and Similar Technologies

10.1 Types of Cookies Used

• Essential cookies: Necessary for platform functionality

• **Performance cookies:** For analysis and service improvement

Functionality cookies: For experience personalization

• Security cookies: For fraud protection

10.2 Cookie Management

You can manage cookies through:

- Your browser settings
- Platform preference tools
- Opt-out of non-essential cookies

10.3 Other Technologies

We also use:

- Web beacons and pixels
- Fingerprinting technologies (for security)
- User behavior analytics

11. Specific Protections for Minors

11.1 Age Restriction

Our services are intended exclusively for persons 18 years of age or older. We do not intentionally collect information from minors.

11.2 Age Verification

We implement checks to confirm that users meet minimum age requirements.

11.3 Action Upon Detection

If we discover that we have inadvertently collected information from a minor, we will take immediate measures to delete such information.

12. Changes to this Policy

12.1 Updates

We may update this Policy periodically to reflect:

- Changes in our practices
- Regulatory changes
- Improvements in our services
- User feedback

12.2 Change Notification

Significant changes will be communicated through:

- Email notification
- Platform notice
- Date update at the top of this Policy

12.3 Material Changes

For changes that substantially affect your rights, we may request new consent when required by law.

13. Jurisdiction and Applicable Law

13.1 Applicable Law

This Policy is governed by the laws of Saint Vincent and the Grenadines, supplemented by international data protection standards where applicable.

13.2 Dispute Resolution

Disputes related to data processing will be resolved according to the mechanisms established in the Terms and Conditions.

14. Contact and Complaints

14.1 Contact Information

For privacy and data protection questions:

GallTek Global LLC (Hiove)

Email: support@galltekglobal.com

Address: Suite 204, Griffith Corporate Centre, Beachmont, Kingstown, Saint Vincent and the Grenadines

14.2 Ticket System

For operational matters related to the Hiove platform, use the support ticket system available in your trading account.

14.3 Response Time

We strive to respond to all privacy inquiries within 30 days.

14.4 Complaints

If we are not adequately addressing your privacy concerns, you may have the right to file a complaint with the competent data protection authority in your jurisdiction.

15. Additional Information

15.1 Transparency

We are committed to transparency in data processing and provide additional information upon reasonable request.

15.2 Ongoing Compliance

We regularly monitor our privacy practices to ensure ongoing compliance with applicable laws and regulations.

15.3 Training

Our team receives regular training on data protection and privacy to ensure proper handling of your information.

This Privacy Policy has been prepared to complement the Hiove Terms and Conditions and should be read in conjunction with them.

For specific questions about this Policy or privacy practices, contact us through the channels indicated above.