

## PRIVACY POLICY

*Axwel is owned and operated by Flux Ltd. Flux Ltd is registered in Comoros Union with a registration IBC number HT00525055, regulated by MISA (MWALI International Services Authority) with a brokerage license number BFX2025069 and registered office address at Bonovo Road – Fomboni Island of Mohéli – Comoros Union*

Flux Ltd, operating the business name Axwel (referred to hereafter as the “Company”, “we”, “us”, “our”, “Axwel”), is issuing this Privacy Policy. The present document governs the collection and use of personal data from individuals - current or potential customers/authorized representatives of legal entities (collectively referred to as “they”, “visitors”)- when they access the website [www.axwel.com](http://www.axwel.com) (hereinafter the “Site”), or engage with our services.

We are dedicated to protect the privacy of visitors and manage their personal data with a commitment to clarity, equity and honesty. As the data controller, Flux Ltd is responsible for defining the reasons and ways in which the visitors’ personal information is processed.

This Privacy Policy explains the categories of personal data the Company may collect when one visits or interacts with the Site, how the data is used, processed, shared, and retained. Visitors can also find the description of their data protection rights, as well as guidance on how they can exercise them.

In case of clarifications or worries about how Axwel handles personal data, do not hesitate to contact us via the ways described in the Site, [www.axwel.com](http://www.axwel.com).

#### A. Definitions

**‘Personal data/personal information’:** any information about visitors, which may, directly or indirectly, identify them.

**‘processing’:** any (series of) action(s) performed on personal data, including: collection, recording, storage, use, disclosure, deletion, or destruction.

#### B. Types of Personal Data

We collect personal data from visitors in several ways: upon visiting the website, upon completion of the online contact form (available on the Site), or upon reaching out using the contact details provided in the website. The personal information we may collect includes: full name and contact details (i.e. telephone number/email address).

Upon opening an account, the Client is asked to fill out a registration form providing first and last name, email address, and phone number. Additional fields may also be completed at the

Client's discretion, such as preferences for receiving support with the registration process via phone, or opting in to receive product updates, newsletters, and communication.

The Company may collect the following personal data, if the visitor provides it:

1. Residential address (including the country, city and zip code)
2. Nationality and information on citizenship
3. Date of birth
4. Identification details (identity or passport or driving license number)
5. Details on your financial status and occupational/employment status and background,
6. Tax residence and tax identification number
7. Knowledge and experience in trading
8. Credit or bank card details.

Axwel will also gather information related to risk tolerance, risk profile and any other data deemed necessary.

For identity and address verification purposes, the Company will request copies of official identification documents- such as national identity card/ passport/ driving license, and a recent utility bill/bank statement, or similar proof of residential address.

If the Client is a corporate entity, the Company must collect additional, which may include corporate registration documents, directors and/or shareholders' details, and any additional information necessary to ensure compliance with applicable regulatory obligations.

Individuals submitting personal information on behalf of others, are considered their authorized representative. In this respect, it is implied that all necessary permissions and consent(s) to disclose such personal information to the Company.

The Company may also collect data relating to your activity on the Site. This may include, amongst others, web pages visited, content viewed, duration of sessions, services visitors expressed interest in, device's location and the Internet Protocol (IP) address. Furthermore, the Company may collect or use third-party services to collect and/or analyze anonymous,

statistical or aggregative data related to the use of the Website. This information helps understand user behavior and improve quality of services.

Visitors are solely responsible and they confirm that the information they submit is complete, accurate, and updated. While there is no legal obligation to provide personal data to the Company, providing false, incorrect, outdated, or partial information may impact our ability to communicate with them or provide the requested services.

Please note that Axwel does not offer services to, nor does it collect/process personal data belonging to individuals under the age of eighteen (18).

### C. Use of the Personal Data

All client information is treated as strictly confidential and used solely for the purposes of delivering, managing, and improving services. This includes conducting identity verification and due diligence procedures in line with applicable legal and regulatory obligations, including anti-money laundering (AML) and counter-terrorism financing (CTF) requirements. We may also use client information for research, statistical analysis, and, where explicit consent has been provided, for marketing purposes.

Information that is publicly available or already in the Company's lawful possession without any confidentiality obligations will not be considered confidential. Axwel collects data for the account opening process and through the course of the business relationship, for due diligence purposes. The data is used to verify the client's identity, address and source of funds, to build an economic profile and to monitor their account in order to comply with applicable regulations and standards including the provisions of anti-money laundering and terrorism financing. Additionally, we use personal data to establish and administer their trading account and to provide technical and customer support.

The collected information supports the development and improvement of the products and services offered on the Site. It enables the enhancement of the website content and provision more personalized content, services, and products.

Personal data may be used -either by the Company or by third parties acting on the Company's behalf- to contact the Client by phone/email with marketing and services information, or surveys.

We will only use personal data for marketing purposes if explicit consent is given or, in certain cases, if we believe it is in our legitimate interest to do so. To opt out of receiving marketing information, you can contact us at [support@axwel.com](mailto:support@axwel.com).

We use the data we collect to better understand our clients through profiling, segmentation, and statistical analysis. If you do not opt out, this information may also be used for promotions and other marketing services or products. When we share data with third parties for analysis, it is generally aggregated and anonymized so that it cannot be linked back to you.

Your personal data will only be processed for the purposes explained in this Policy and in our Terms and Conditions on our website.

#### D. Transfer of Personal Data to third parties

During the course of the business relationship and for legitimate business purposes, Clients' personal data may be shared with one or more of the following categories of recipients:

1. **Third Service Providers**, such as auditors, lawyers, consultants/advisors third parties who assist with the effective provision of services by offering technological expertise, solutions, and support, and other service providers who may assist with Site maintenance and enhancement. We may also transfer personal data to service providers to facilitate email communications with Clients;
2. **Group Entities** (companies that belong to the same group as the Company);
3. In any case of dispute, or legal proceeding of any kind relating to the Client and concerning the Site we may share personal information with **attorneys, courts, and any other party** relevant to such proceedings;
4. With **government bodies, component and law enforcement authorities and organizations** in case we were requested during an investigation;

5. With the categories of people/organizations in c) and d), if we identify that you abused your rights to use the Site, or violated any applicable law;

Except as otherwise specified above, your personal data will not be disclosed to third parties without prior, explicit consent.

**E. Transfer of data outside the EU**

**F. Your personal data may be processed in countries whose laws offer less protection than those in your home country. When this happens, we take measures to keep your information properly protected. If you live in the EU and we transfer your data to a service provider outside the EEA in a country that the EU Commission has not deemed as offering adequate protection, we take steps to put suitable safeguards in place so your personal data stays secure.** Our Lawful Basis

We may process your personal data based on one or more lawful bases of processing (“Lawful Basis”) depending on the specific purpose for which your data is being used. The Lawful Basis are the following:

1. to perform our contractual obligations towards you;
2. to be compliant with applicable legal and regulatory requirements;
3. to pursue our legitimate interests.

**G. If we need to use Clients’ personal information for purposes not covered by the lawful bases mentioned earlier, we will first request their explicit consent. Consent is completely voluntary, and it can be withdrawn whenever, by reaching out through the contact details in this Privacy Policy or by unsubscribing from emails.** Retention of Personal Data

**H. We keep personal data only for as long as we need it to serve the purpose for which it was collected. In deciding how long to retain it, we consider local laws, our contractual obligations, and what our clients reasonably expect. When the data is no longer needed, we securely delete or destroy it. Several situations may require us to remove personal data—please refer to the section below for more information.** Client Rights

Clients have the right at any time to ask Axwel to give them access to their personal data, provide a copy of it, delete it, or correct and update any information that is inaccurate or incomplete. They can also request that we stop using their personal data or that we stop

sharing it with third parties. We will handle such requests as quickly as possible, while also meeting any legal obligations.

In certain situations, it is also acceptable for the Client to ask to limit how their personal data is processed or request that their data be transferred to another organization. When these conditions apply, we will restrict the processing of their data and arrange for it to be transferred as requested.

In some cases, Clients have the right to object to specific types of processing. This includes direct marketing or situations where we rely on legitimate interests (ours or a third party's) and the Client believes that such processing affects their rights and freedoms. In limited circumstances, we may need to show that we have strong and valid reasons to continue processing the data.

If the Client has previously given us their consent to process their personal data, they can withdraw it at any time. This will not affect the lawfulness of any processing carried out before the withdrawal.

If the Client suspects that their personal data has ever been processed in ways that do not comply with relevant regulations, they also have the right to file a complaint with the supervisory authority in their country of residence, their workplace, or where the issue took place.

To exercise any of the aforementioned rights, please send a request to [support@axwel.com](mailto:support@axwel.com).

The Company may also correct, update, or remove incomplete or inaccurate information at any time at its discretion.

- I. If the Client choose to opt out of receiving marketing communications, we will keep their details on a suppression list to ensure they do not receive future marketing messages.

We use various types of cookies and other types of web trackers, which enable us to administer and operate the Website. Our cookies and trackers are used mainly to collect statistical information about the use of the Website. We use cookies for Website analytics

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purposes, as explained above. The Client always has the option to opt out whether they already accepted cookies or not. In this respect, they can block, delete, or adjust the cookies settings on their browser.

Please refer to our Cookies Policy for more information.

#### J. Policy Updates

The Company may amend/update this Policy at any time. By continuing to use the Website after such changes have taken place, the Client indicate acceptance of the updated terms. In the event of any material changes, we will take reasonable steps to notify the Clients.

#### K. Contact Us

You can contact us for more information or to submit enquiries regarding this Policy at [support@axwel.com](mailto:support@axwel.com).

In case of complaints regarding the way personal data was handled, Clients may contact us directly at [support@axwel.com](mailto:support@axwel.com). We take all concerns seriously and aim to address them promptly. If Clients are not satisfied with the response, or believe there is a breach, they can lodge a complaint with the relevant data protection authority.