

# プライバシーポリシー PRIVACY POLICY

This Privacy Policy outlines the procedures by which Seikum (referred to as "the Company") collects and utilizes information on its website, www.seikum.com, or any other websites operated by the Company. The Company is dedicated to safeguarding the information it gathers, uses, and maintains about its clients. Prior to signing up for the Trader's Room, the Company strongly advises clients to review this Policy. If you have any inquiries regarding the Privacy Policy, please contact the Company using the provided contact information on the Company's website.

#### 1. Personal Data of the Client

- 1.1. To establish an account with the Company, the client is required to complete and submit an application form. During the registration process, the client consents to provide their personal data and submit copies of verifying documents.
- 1.2. The personal data provided by the client may encompass:
- 1.2.1. Personal information provided in applications and other forms, including name, surname, address, date of birth, passport details, occupation, and position.
- 1.2.2. Financial information, such as the client's investment experience.
- 1.2.3. Identification documents: scanned copies of a passport, utility bills, and bank references.
- 1.2.4. Payment documents: transfer orders, bank statements, copies of credit/debit cards, screenshots, etc.
- 1.2.5. Credit/debit card details (when depositing/withdrawing funds via credit/debit card).
- 1.3. The Company requests this personal information to verify and identify the client, as well as to comply with relevant rules and regulations. This information may also be utilized by the Company to communicate with the client regarding its services.
- 1.4. Individuals under the age of 18 are requested by the Company to abstain from registering and utilizing the services provided. The Company regards the privacy of minors as of paramount importance and therefore refrains from collecting information on individuals under the age of 18.

#### 2. Information Collected from the Client's Use of Services

2.1. Tracking systems employed on the Company's website(s) may gather additional client data to optimize the services offered to clients. This data may encompass information about the client's device, log information, location information, and cookies. By receiving this information, the Company can provide the client with the most suitable version of the website(s), track user actions to troubleshoot issues, enhance website(s) performance, and improve future advertising campaigns.

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## 3. Confidentiality of the Client's Personal Data

- 3.1. The Company shall not disclose any confidential information about its clients to third parties unless:
- 3.1.1. It is mandated to do so by a regulatory authority of competent jurisdiction. In such instances, the Company will officially inform the third party about the confidential nature of the information.
- 3.1.2. The disclosure of information to third parties is solely for the purpose of processing the client's trading and non-trading instructions. In such cases, third parties may include affiliated companies, auditors, agents (including payment agents), banks, or other authorized organizations or individuals.
- 3.2. In the event that the client's personal data are collected for a third party not affiliated with the Company, the Company undertakes to notify the client. This empowers the client to make an informed decision about whether to share their information with that party.

#### 4. Cookies

4.1. A cookie is a small text file stored on a user's computer for record-keeping purposes. The Company employs cookies on its site(s). The Company does not associate the information stored in cookies with any personally identifiable information clients may submit. The Company uses both session ID cookies and persistent cookies. A session ID cookie remains valid after the client closes their browser. Persistent cookies are stored on the hard drive for an extended period. Clients can remove persistent cookies by following the instructions provided in their Internet browser's help file. The Company's website uses persistent cookies for statistical purposes. The use of persistent cookies also enables the Company to track and identify user locations and interests when visiting the Company's site(s), thereby enhancing the quality of services. 4.2. Several of the Company's partners use cookies on the Company's site(s), over which the Company has no access or control.

## 5. Safety and Protection of Client's Personal Information

5.1. Personal information provided by the client during site(s) or service registration is classified as Registered Information. Registered Information is safeguarded through various measures. Clients can access Registered Information through a password selected during registration. This password is encrypted and known solely to the client, who should not share it with anyone. Registered Information is securely stored on

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servers accessible solely to authorized personnel via a password. To enhance personal information security, the Company may employ SSL certificates.

5.2. Personal information provided to the Company that does not qualify as Registered Information is similarly stored on secure servers and accessible only to authorized personnel via a password. Clients have no access to this information, and therefore, no ability to modify it.

## 6. Credit/Debit Card Data Safety

6.1. The client's confidential data is processed in a processing center. The client's credit/debit card details are not stored in the payment system after the transaction is completed using the card.

## 7. Changes to Personal Information

7.1. In the event of any changes to personal information, the client should promptly inform the Company using the contact information provided on the website.

#### 8. Content of External Sites

8.1. The Company's website may include links to external websites over which the Company has no control. Therefore, the Company is not responsible for their content. The provider of the website or information is responsible for the content of external sites.

## 9. Legal Disclaimer

- 9.1. The Company reserves the right to disclose personally identifiable information as required by rules and regulations, and when deemed necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served.
- 9.2. The Company shall not be held liable for any misuse or loss of personal information resulting from the use of cookies on the Company's website(s) that are beyond the Company's access or control.
- 9.3. The Company shall not be held liable for unlawful or unauthorized use of personal information due to password misuse, negligence, or malicious actions.

#### 10. Changes to the Privacy Policy

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10.1. Should the Company decide to modify the Privacy Policy, such changes will be reflected in this privacy statement, on the website, and other suitable locations as determined by the Company. This way, the client is kept informed about what information the Company collects, how it is used, and under what circumstances it may be disclosed. The Company reserves the right to amend this Privacy Policy at any time; therefore, we recommend revisiting it periodically. In the event of significant policy changes, the Company will notify clients via email or on the website. By continuing to use the website services or visiting it, clients automatically agree to any changes made to the Policy.

