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Privacy Policy Statement

AXON MARKETS LTD. IMAD Complex, Office 12, 3rd Floor, Ile Du Port, Mahe, Seychelles.

*Independent Representative and Distributor: **HDZ Capital Ltd.** 1 Agias Zonis & Thessalonikis, Nicolaou Building, Block B, Office 603, 3026, Limassol, Cyprus.*

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1. INTRODUCTION

Axon Markets Ltd with registered tradename Axon Markets (hereinafter referred to the "Company") is a Securities Dealer Licensee regulated and authorised by the Financial Services Authority ('FSA') in Seychelles under the license number SD115 (hereinafter referred to the "Company").

We understand the importance of maintaining the confidentiality and privacy of personal information that we hold about our clients and other third parties. This Privacy Policy Statement (hereinafter 'this Statement') outlines how we manage and protect the personal information you give us and hold about our clients. By visiting our website and using our services, your agreement to this Policy is implied.

This Policy will be reviewed periodically to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. You should check this Statement from time to time to ensure

that you are happy with any changes. Any information held will be governed by our most current Policy.

2. COLLECTION AND PROCESSING OF PERSONAL INFORMATION

In order to open an account with us, you must first complete and submit an application form to us by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant rules and regulations. The information you provide may also be used by the Company to inform you regarding its services.

We obtain this information in a number of ways through your use of our services including through any of our websites, apps, the account opening applications, our demo sign up forms, webinar sign up forms, subscribing to news updates and from information provided in the course of ongoing customer service communications. We may also collect this information about you from third parties such as through publicly available sources.

The personal data you provide us with, is used to verify contact information and identity. We also use personal data to register clients, open and configure trading accounts, and issue activation codes and passwords. By providing contact information, you help us improve our services and promptly communicate the availability of additional services, features, and promotions we may be offering.

If you choose not to provide the information, when we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

3. GOOGLE OAUTH AUTHENTICATION

3.1 Google User Data We Access

When you choose to authenticate using **Google Sign-In**, we access the following Google user data:

- **Email Address:** Used for account identification and communication
- **Basic Profile Information:** Your name and profile picture for account personalization
- **Google Account ID:** Unique identifier to securely link your Google account with your Axon Markets account

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We only request the minimum permissions necessary to provide authentication services. We do **not** access your Gmail, Google Drive, Google Calendar, or any other Google services beyond basic profile information.

3.2 How We Use Google Data

Information obtained through Google OAuth is used to:

- Authenticate your identity when signing in to our platform
- Link your Google account to your Axon Markets account for seamless access
- Pre-fill registration information to streamline the account opening process
- Send account-related communications to your verified email address

We do not:

- Use your Google data for advertising purposes without explicit consent
- Share your Google data with third parties except as outlined in Section 6
- Store your Google password (authentication is handled securely by Google)

3.3 How We Share Google Data

Google user data obtained through OAuth is not shared with third parties except:

- When required by law or legal process
- When necessary to protect our rights, property, or safety
- With your explicit consent
- With service providers contractually obligated to protect your data and use it only for specified purposes

We do not sell, rent, or trade your Google user data to any third parties.

3.4 How We Protect Google Data

Google user data is protected with:

- **Encryption:** SSL/TLS encryption for all data transmission
- **OAuth 2.0 Protocol:** Industry-standard secure authentication
- **Access Controls:** Strict employee access limitations
- **No Password Storage:** Your Google password is never stored on our servers

3.5 Data Retention and Deletion

Google OAuth data follows our standard retention policy of **seven (7) years** after account closure, as required by financial services regulations.

To request deletion of your data:

1. Email: support@axonmarkets.com with "Data Deletion Request" in subject line
2. We will process your request within 30 days
3. Data subject to regulatory requirements will be retained for 7 years, then permanently deleted

To revoke Google access immediately:

- Visit [Google Account Permissions](#)
- Find "Axon Markets" and click "Remove Access"
- Or contact us at support@axonmarkets.com

4. HOW WE USE COOKIES

When you use our website, we will use cookies to distinguish you from other users of our website. This helps us to provide you with a more relevant and effective experience when you browse our website, including presenting websites according to your needs or preferences and allows us to improve the site generally.

5. HOW WE USE YOUR INFORMATION

We use your personal information to:

- Verify your identity and contact information
- Register clients and open trading accounts
- Issue activation codes and passwords
- Process transactions and execute trades
- Provide customer support
- Comply with KYC/AML and regulatory requirements

- Send account notifications and communications
- Improve our services and develop new features
- Prevent fraud and unauthorized access

6. DISCLOSURE OF THE PERSONAL INFORMATION

The Company shall not disclose any of its clients' confidential information to a third party, except:

The Company shall not disclose any of its clients' confidential information to a third party, except:

- a) to the extent that it is required to do so pursuant to any applicable laws, rules and/or regulations; and/or
- b) if there is a duty to the public to disclose; and/or
- c) if our legitimate business interests require disclosure; and/or
- d) at your request or with your consent or to persons described in this Statement.

The Company will endeavour to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

Depending on the products and services concerned and the relevant restrictions on sensitive data, personal information may be disclosed to:

- potential successors in title to our business;
- third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
- any organisation or person acting on your behalf to whom you request us to provide information, including your financial advisor, broker, solicitor or accountant;
- third parties where it is necessary to process a transaction or provide services you have requested;
- to a Trade Repository or similar;

- Banks (where they request additional information following payments that you have made);
- credit providers, courts, tribunals and regulatory authorities in response to legal and regulatory requests or other government agencies, as agreed or authorised by law;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, in any jurisdiction where we operate;
- at your request or with your consent.

7. DATA STORAGE, SECURITY AND PROTECTION

Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium.

We will hold personal information, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

Security measures include:

- **Encryption:** SSL/TLS encryption for data transmission
- **Secure Authentication:** Multi-factor authentication options
- **Access Controls:** Strict employee access limitations
- **Regular Security Audits:** Ongoing vulnerability assessments
- **Firewall Protection:** Network security to prevent unauthorized access
- **Secure Data Centers:** Servers in monitored, secure facilities

8. DATA RETENTION AND DELETION

8.1 Retention Period

When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time.

We are subject to certain anti-money laundering laws which require us to retain the following, for a period of **seven (7) years** after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer due diligence obligations;
- supporting evidence and records of transactions with you and your relationship with us.

Also, the personal information we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e., 7 years after our business relationship with you has ended).

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

8.2 How to Request Data Deletion

You have the right to request deletion of your personal information.

To request deletion:

1. Email: support@axonmarkets.com
2. Subject line: "Data Deletion Request"
3. Include: Your full name and account details
4. We will process your request within 30 days
5. Note: Some data must be retained for 7 years for regulatory compliance

Important: Once the retention period expires, all remaining personal data will be permanently deleted.

9. HOW WE OBTAIN YOUR CONSENT

Where our use of your personal information requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s) as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

By submitting any personal information (including, without limitation, your account details) to us, you consent to the use of information as set out in this Statement. We reserve the right to amend or modify this Statement and if we do so, we will post the changes on the Website. It is your responsibility to check the Privacy Policy when you submit information to us. Your use of the Website will signify that you agree to any such changes.

If we rely on your consent as our legal basis for holding and processing your personal information, you have the right to withdraw that consent at any time by contacting us, using the contact details set out in this Privacy Policy.

10. GOOGLE API SERVICES COMPLIANCE

Axon Markets' use of information received from Google APIs adheres to the [Google API Services User Data Policy](#), including the Limited Use requirements.

Limited Use Disclosure:

- We only request access to data necessary for authentication and account management
- We do not use Google user data for serving advertisements
- We do not allow humans to read Google user data unless:
 - We have your explicit consent
 - It is necessary for security purposes
 - Required to comply with applicable law
- We do not transfer Google user data to third parties except as disclosed in Section 6

Scope of Access:

We access only:

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- Email address
- Basic profile information (name, profile picture)
- Google Account unique identifier

We do **not** access Gmail, Google Drive, Google Calendar, or any other Google services.

11. AMENDMENTS

We may, at any time and at our discretion, vary this Policy. We will notify you, if we amend this Privacy Policy, by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change.

12. HOW TO CONTACT US

If you have any questions regarding this Policy, wish to access or change your information, or if you have any questions about security on our website, you may email us at support@axonmarkets.com.

If you have a concern about any aspect of our privacy practices, you can submit a complaint. This will be acted upon promptly. To make a complaint, please contact us via email at complaints@axonmarkets.com.

For Google OAuth specific inquiries: Email support@axonmarkets.com with "Google OAuth Privacy" in the subject line.