

PRIVACY POLICY

Effective Date: [●] 2025

1. Introduction

IQ labs LTD, a company incorporated and existing under the laws of St. Vincent and the Grenadines, Business Company Number 26631 BC 2022 (the "**Company**", "**we**") is committed to protecting your privacy and ensuring the security of your personal data. This privacy policy explains how we collect, use, disclose, and protect your information when you – our customer (the "**Customer**", "**you**") visit our website <https://sailsrock.com/> (the "**Website**") and use our online services (the "**Services**"). It also outlines our adherence to Know Your Customer (KYC), Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) regulations to prevent financial crimes and enhance customer security.

This privacy policy applies to personal data that we collect from you when you visit the Website, create an account, use our applications or the Services. It provides information on what personal and other data we collect, why we collect personal data, how it is used, the lawful basis on which your personal data is processed, how it is stored, and how we share information.

As used in this privacy policy, "**data**" or "**personal data**" means any information that relates to you from which you can be identified.

Our services are not intended for individuals under the age of eighteen (18). We do not knowingly collect personal information from children. If we become aware that we have collected data from a child, we will take steps to delete it promptly.

By using the Services or submitting your data, you are agreeing to accept the terms of this privacy policy, so we encourage you to read it carefully. If you disagree with this privacy policy at any point or time, you should stop using the Services and delete your account.

2. Objectives and principles of data processing

Our data processing activities adhere to the following objectives and principles:

- compliance with applicable local and international laws and regulations, including, *inter alia*, the applicable Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) regulations;
- identifying and mitigating risks related to fraud, money laundering, and illicit activities;
- establishing a secure and transparent environment for the Customers;
- processing data in a lawful, fair, and transparent manner;
- collecting data for specific, legitimate purposes;
- only collecting relevant and necessary information;
- ensuring data accuracy and prompt updates;
- retaining data only for as long as necessary; and
- protecting data through robust security measures.

3. Data that we collect

We collect and process the following categories of data:

- personal identification information;
- identification information of legal persons;
- contact information of all Customers (email and phone number);

(by providing your phone number, you agree to receive text messages from us. Message and data rates may apply. Message frequency varies. We will not share your contact phone number with any other parties unless explicitly specified by this privacy policy.)
- financial information (bank account details, credit/debit card numbers, source of funds and trading history);
- technical data (IP address, browser type, operating system, and device identifiers);

(we use browser cookies (small text files placed on your device) to administer the Website, gather and analyze statistical information, ensure security, to fight spam, and for advertising purposes. Cookies allow us to provide you with a better user experience when you browse the Website and helps to improve its features.)
- usage data (clickstream data, service history, and interaction with the Website); and
- KYC verification data (identity information and documents of the Customers (both individuals and legal persons) required under our KYC/AML/ATF policy available at [\[●\]](#) (in addition to the data specified above)). **[GFLO: добавить ссылку на политику.]**

4. Collection methods

Your data may be collected through, *inter alia*, the following means:

- provision of data by filling out forms, creating an account, providing documents, completing verification procedures, participating in promotions, or contacting us directly;
- collection of data automatically as you interact with the Website through cookies, server logs, and other tracking technologies;
- collection of information about the communication and any additional information that you choose to give us when you contact us by telephone, email, post or use another function offered by us; and
- receipt of data from third parties such as financial institutions, verification service providers, analytics providers, advertising networks, and publicly available sources.

5. Use of your information

We process your personal data for legitimate business purposes, including but not limited to:

- to enable trading, facilitate transactions, process payments, and maintain customer accounts;
- to comply with the KYC/AML/ATF, tax, and financial reporting obligations;

- to detect, prevent, and mitigate fraudulent or unauthorized activities;
- to respond to inquiries, provide assistance, and resolve disputes;
- to inform the Customers about relevant offers and updates (with consent); and
- to optimize services, assess market trends, and enhance user experience.

With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

We will not use your personal data for purposes unrelated to those specified above without obtaining explicit consent. We, however, wish to alert you that:

- no systems for storage or transfer of data via the internet may guarantee full security;
- we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide levels of data protection equivalent to your home jurisdiction.

6. Data security

We implement strict security measures to protect your personal data against unauthorized access, loss, alteration, or disclosure. These measures include:

- data encryption (all sensitive data is encrypted both in transit and at rest);
- access controls (we ensure restricted access to authorized personnel only);
- monitoring & auditing (we make regular security audits and ensure real-time monitoring of suspicious activities); and
- incident response plan (we implement procedures for detecting and responding to security breaches).

7. Sharing and disclosure of information

We may share your personal data:

- within our corporate structure – to deliver the Services;
- with regulatory authorities – to comply with applicable laws, KYC/AML/ATF obligations, and tax regulations;
- with service providers such as payment processors, fraud detection agencies, and data analytics providers;
- for the purposes of the business transfers – in the event of mergers, acquisitions, or business restructuring; and
- in response to legal requests or court orders (if required by law).

We do not sell, rent, or trade your personal data to third parties for marketing purposes without your explicit consent.

8. Data retention

We retain personal data only as long as necessary to fulfill the purposes outlined in this privacy policy or as required by applicable laws. Our retention periods are as follows:

- customer information is retained for at least five (5) years after account closure or last transaction in compliance with KYC/AML/ATF regulations;
- transaction records is retained for financial and legal audit purposes; and
- marketing preferences is retained until the Customer unsubscribes or withdraws consent.

Upon expiration of retention periods, data is securely deleted or anonymized.

If you provide us with personal information that we have not requested then we will endeavour to only retain the information that we are entitled or required to hold because of the Services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

9. Customer's rights and responsibilities

The Customers have the right to:

- request access to the personal information we hold about you;
- request that we correct any inaccurate or incomplete information;
- request that we delete your personal information, subject to certain legal obligations;
- request that we restrict the processing of your data in certain circumstances;
- request a copy of your data in a structured, machine-readable format;
- object to the processing of your data for certain purposes, such as direct marketing; and
- withdraw your consent to the data processing at any time.

The Customers' responsibilities include:

- providing accurate and up-to-date information;
- notifying us of changes to personal details; and
- cooperating in the KYC/AML/ATF verification process.

If you accept or agree to this privacy policy on behalf of a company or other legal entity, you represent and warrant that you have the authority to bind that company or other legal entity to this privacy policy and, in such event, "you" and "your" will refer and apply to that company or other legal entity.

By accessing and using the Services and the Website, you acknowledge that we may rely upon any information provided by you and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of the Services to your profile.

10. Changes to the policy

We may update this privacy policy from time to time to reflect changes in our practices, legal requirements, or regulatory obligations. We will notify you of any material changes by posting the updated policy on the Website and updating the "Effective Date" at the top of this document. Your continued use of our services after such changes constitutes your acceptance of the updated policy.

11. Terms and conditions

This privacy policy is an integral part of the terms and conditions available at [•] [GFLO: *добавить ссылку на страницу с Terms and Conditions.*], shall be read in conjunction with them and as a single document.

12. Final provisions

This privacy policy in electronic form has legal effect as a document signed in writing.

If any provision of this privacy policy is found to be invalid or unenforceable, the remaining provisions shall remain in full force and effect.

13. Contact information

For questions or concerns regarding this privacy policy, please contact:

Email: support@sailsrock.com

Adress: C/O Suite 305, Griffith Corporate Centre, Kingstown