
PRIVACY POLICY

Data Collection, Processing and Client Rights

| | |
|-----------|-----------------------------------|
| Company | STB Provider LTD |
| Reg. No. | 2023-00478 (Saint Lucia) |
| Version | v2026.1 |
| Category | Privacy & Data |
| Effective | 2026 — subject to periodic review |
| Website | stbbrokers.com |

IMPORTANT: This document forms part of the legal agreement between STB Provider LTD and the Client. Please read it carefully before using our services. By opening an account or placing any trade, you confirm that you have read and accepted this document in full.

1. Introduction

STB Provider LTD ("STB", "we", "us", "our") is committed to protecting and respecting your privacy. This Privacy Policy ("Policy") explains how we collect, use, store, disclose, and protect personal information obtained from individuals who visit our website, open an account, or use our trading services.

This Policy applies to all personal data processed by STB in connection with our services and complies with applicable data protection legislation, including the data protection framework of Saint Lucia and, where applicable, the General Data Protection Regulation (GDPR) principles as a standard of best practice.

By accessing our website or opening an account, you acknowledge that you have read and understood this Privacy Policy and consent to the collection and use of your personal information as described herein.

2. Who We Are

Data Controller: STB Provider LTD

- Registered in: Saint Lucia — Registration No. 2023-00478
 - Registered Address: [Registered Office Address, Saint Lucia]
 - Website: stbbrokers.com
 - Email: privacy@stbbrokers.com
 - Support: support@stbbrokers.com
-

3. Personal Data We Collect

3.1 Identity and Contact Data

- Full legal name, date of birth, nationality, country of residence.
- Email address, telephone number, residential and mailing address.
- Government-issued identification (passport, national ID, driver's licence).
- Proof of address (utility bill, bank statement).
- Tax identification number (TIN) and tax residency information.

3.2 Financial Data

- Employment status, annual income, net worth, and source of funds.
- Bank account details and payment card information (where applicable).
- Transaction history, deposit and withdrawal records.
- Trading account balances, positions, and portfolio information.

3.3 Trading and Behavioural Data

- Trading history, order history, and position records.
- Platform usage data, session logs, and interaction records.

- Communication records including chat transcripts, email correspondence, and call recordings.
- Trading preferences, risk appetite assessments, and knowledge/experience questionnaire responses.

3.4 Technical and Device Data

- IP address, device identifiers, browser type and version.
- Login timestamps, access logs, and session data.
- Geographic location data derived from IP address.
- Cookies and similar tracking technologies (see Section 10).

3.5 Sensitive Personal Data

We may process sensitive personal data only where strictly necessary and with your explicit consent or where required by law. This may include national origin for sanctions screening, and in limited cases, religious information in the context of Swap-Free (Islamic) account applications.

4. How We Collect Your Data

| Source | Examples |
|--------------------------------|--|
| Directly from you | Account registration, KYC submissions, correspondence, support requests |
| Automated systems | Platform activity, cookies, server logs, IP tracking |
| Third parties | KYC/AML verification providers, credit reference agencies, sanctions databases |
| Public sources | Company registries, regulatory databases, media (for PEP screening) |
| Introducing Brokers/Affiliates | Client referrals where you have been introduced to STB via a partner |

5. Lawful Basis for Processing

| Processing Activity | Lawful Basis |
|---|--|
| Account opening and KYC verification | Legal obligation; contract performance |
| Providing trading services | Contract performance |
| AML/CFT screening and monitoring | Legal obligation |
| Fraud prevention and security | Legitimate interests |
| Marketing communications | Consent (withdrawable at any time) |
| Call recording and communication monitoring | Legitimate interests; legal obligation |
| Tax reporting and regulatory returns | Legal obligation |

| Processing Activity | Lawful Basis |
|--|---------------------------------|
| Improving services and product development | Legitimate interests |
| Profiling for personalised services | Consent or legitimate interests |

6. How We Use Your Personal Data

We use your personal data for the following purposes:

- To verify your identity and assess your suitability for our services in accordance with KYC/AML obligations.
- To open, manage, and administer your trading account(s).
- To process deposits, withdrawals, and transactions.
- To provide client support and respond to enquiries.
- To monitor trading activity for compliance with our Client Agreement, this Policy, and applicable law, including detection of abusive or suspicious trading patterns.
- To send service-related communications including account updates, policy changes, and security alerts.
- To send marketing communications about STB products and services where you have provided consent.
- To comply with legal obligations including reporting to regulatory and tax authorities.
- To investigate, detect, and prevent fraud, money laundering, and other financial crimes.
- To improve our platform, services, and user experience.
- To record and retain communications for compliance, dispute resolution, and training purposes.

7. Data Sharing and Disclosure

7.1 Third-Party Service Providers

We share personal data with carefully selected third-party service providers who process data on our behalf, including:

- KYC and identity verification providers.
- Payment processors and banking partners.
- IT infrastructure, cloud hosting, and platform providers.
- Fraud detection and AML screening services.
- Legal, compliance, and audit advisors.
- Customer communication and CRM platforms.

All third-party processors are required to implement appropriate data protection measures and may only process your data in accordance with our instructions.

7.2 Regulatory and Legal Disclosure

We may disclose personal data to regulatory authorities, law enforcement agencies, courts, or other public authorities where required by law, court order, or regulatory obligation. This includes disclosure for purposes of AML/CFT compliance, tax reporting (e.g. CRS/FATCA), and regulatory examinations.

7.3 Business Transfers

In the event of a merger, acquisition, sale of assets, or corporate restructuring, your personal data may be transferred to the acquiring entity as part of the transaction. You will be notified of any such transfer that materially affects your data rights.

7.4 No Sale of Personal Data

STB does not sell, rent, or trade your personal data to third parties for their own marketing purposes.

8. International Data Transfers

Your personal data may be transferred to and processed in countries outside your country of residence, including countries that may not provide the same level of data protection as your home jurisdiction. Where such transfers occur, STB implements appropriate safeguards including standard contractual clauses or equivalent mechanisms to ensure your data remains protected.

9. Data Retention

| Data Category | Retention Period |
|-------------------------------------|---|
| Account and KYC documents | 5 years after account closure (minimum) |
| Transaction records | 5 years from transaction date |
| Communication records (calls, chat) | 5 years from date of recording |
| Marketing consent records | Until consent is withdrawn + 3 years |
| Technical/access logs | Up to 2 years |
| Compliance investigation records | Duration of investigation + 5 years |

Where retention is required by law, regulatory guidance, or ongoing legal proceedings, data may be retained beyond these periods. Data is securely deleted or anonymised at the end of the applicable retention period.

10. Cookies

Our website uses cookies and similar technologies to improve user experience, analyse site traffic, and support marketing activities. Cookie categories include:

- Essential cookies: Required for the website and platform to function. Cannot be disabled.
- Analytics cookies: Used to understand how visitors interact with our website (e.g. Google Analytics). Can be declined.
- Marketing/targeting cookies: Used to deliver relevant advertising. Require your consent.
- Preference cookies: Remember your settings and preferences for future visits.

You may manage cookie preferences via our cookie consent tool available on the website. Note that disabling certain cookies may affect the functionality of the website or platform.

11. Your Data Rights

Subject to applicable law, you have the following rights in relation to your personal data:

| Right | Description |
|------------------|---|
| Access | Request a copy of the personal data we hold about you. |
| Rectification | Request correction of inaccurate or incomplete personal data. |
| Erasure | Request deletion of personal data where there is no lawful basis for continued retention. |
| Restriction | Request that we restrict processing of your data in certain circumstances. |
| Portability | Receive your data in a structured, machine-readable format where processing is consent-based. |
| Object | Object to processing based on legitimate interests or for direct marketing purposes. |
| Withdraw Consent | Withdraw any consent given at any time, without affecting prior processing. |
| Complaint | Lodge a complaint with the relevant supervisory authority. |

To exercise any of these rights, please contact us at privacy@stbbrokers.com. We will respond within 30 days. Identity verification may be required before we can process your request.

12. Data Security

STB implements technical and organisational measures to protect your personal data against unauthorised access, loss, destruction, or alteration. Security measures include:

- TLS/SSL encryption for all data in transit.
- AES-256 encryption for sensitive data at rest.
- Multi-factor authentication for account access.
- Role-based access controls limiting internal access to personal data on a need-to-know basis.
- Regular security audits, penetration testing, and vulnerability assessments.
- Incident response procedures for data breaches, including notification obligations.

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal obligations. Material changes will be communicated via email or notice on our website. The current version of this Policy is always available at stbbrokers.com/legal.

14. Contact Us

For any questions, requests, or concerns relating to this Privacy Policy or our handling of your personal data, please contact:

- Email: privacy@stbrokers.com
- Support: support@stbrokers.com
- Website: stbrokers.com
- Address: STB Provider LTD, [Registered Office], Saint Lucia

STB Provider LTD · stbrokers.com · Last updated: 2026