

# PRIVACY POLICY 2025



### PRIVACY POLICY

Trilogy Ventures Ltd (hereinafter the "Company" or "us" or "we", or "our") operates <a href="https://www.mysurefunds.com">www.mysurefunds.com</a> (the "Site"). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.

We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

### 1. Information Collection and Use

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal identifiable information may include, but is not limited to your name ("Personal Information").

The Company will be the controller of your personal data provided to, or collected by or for, or processes in connection with our services and regulated activities.

The provision of "Your Data" is required from you to enable us to provide our services. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

In the course of your registration as a client, signing up for a demo or a live account with <a href="https://www.mysurefunds.com">www.mysurefunds.com</a> or filling in any form on our Website, subscribing to our services, news or offers, marketing communications or posting material, the following information about you ("Your Data") will be collected and stored for administrative, service related and/or legal purposes.

We will limit the collection of personal information to what is necessary to administer our business and carry out our regulated activities in an effort to provide you with superior service, Information that you provide to us directly:

- Personal information, such as names, addresses, personal registration number, national identification number, passport number and email addresses etc ("Personal Information"), and
- Financial Information, trading experience and employment information for appropriateness assessment will also be collected.

However, the meaning of data "provided to" Trilogy Ventures Ltd is not limited to this. It is also personal data resulting from observation of your activities (i.e., where using a device or service).

This may include:

 History of website usage or search activities, details of your visits to our Website including, communication data;





- Traffic and location data:
- Website traffic pattern information, including IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This kind of information is only used in masked or aggregated form, which means that the individual user will not be recognisable. These data do not identify any individual.
- Communications between you and <a href="www.mysurefunds.com">www.mysurefunds.com</a> via Live Chat, email, or telephone call.

Your e-mail address may be used by Trilogy Ventures Ltd in relation to its products and services (including any marketing campaigns related to these products or services). If you do not wish to receive such marketing material and marketing communications, you can opt-out at any time by clicking on "unsubscribe" or by sending us an email stating so.

Specifically, please refer to the below table for the type of date collected and the purpose of the relevant collection:

- 1. Personal Information including Full Name, date of birth, address, citizenship, ID or passport number, social security number To meet our anti money laundering (AML) and other regulatory AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence. To verify your identity using our verification processes.
- 2. Contact Information including phone number and email address In order to send you correspondence in relation to the services provided and to fulfil our regulatory and compliance obligations.
- 3. Financial sanctions and credit header information In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, criminal convictions or political interests leading to us making decisions based on the results of these checks.
- 4. IP address When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.
- 5. Proof of identification & proof of address In order to comply with KYC and regulatory trade reporting and other AML obligations.

### 2.Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze.

### 3. Communications

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information.





### 4.Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

### 5.Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

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### 6. Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

# 7. Period that your personal information will be kept – Data Retention

You can close your account any time, but for audit trail purposes, Trilogy Ventures Ltd shall hold personal data for a period of at least five years after closing the account in order for us to comply with our record keeping obligations under the Money Laundering Regulations 2017.

At the end of that period, we will delete all personal data relating to you, unless a legal requirement requires them to keep the data for a prolonged period of time, or Data Subject has expressly consented to their data being held for an extended period of time.

### 8. Changes to this Privacy Policy

This Privacy Policy is effective as of March 2025 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your



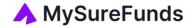


consent to abide and be bound by the modified Privacy Policy.

### 9. Contact Us

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

If you have any questions about this Privacy Policy, please contact us at <a href="mailto:support@mysurefunds.com">support@mysurefunds.com</a>





## **Cookies and GDPR Policy**

Effective Date: January 2025 This Privacy and Cookies Policy ("Policy") describes how Trilogy Ventures Ltd ("Company", "we", "us", or "our") collects, uses, and protects personal data in connection with the website www.mysurefunds.com ("Site"). By using our Site, you agree to the terms of this Policy.

- 1. Information Collection and Use We may collect and process personal information, including but not limited to your name, address, email address, date of birth, financial information, and other data necessary to provide our services. Information may be collected when you register, use our services, contact us, or interact with the Site.
- 2. Lawful Basis for Processing (if GDPR Applies) This clause applies only if our services are directed to or accessed by users located in the European Union (EU) or European Economic Area (EEA). When applicable, we process personal data under the following lawful bases: Consent (Article 6(1)(a) GDPR) for email marketing or cookie tracking when consent is provided. Contract (Article 6(1)(b) GDPR) to perform our obligations when you use our services. Legal Obligation (Article 6(1)(c) GDPR) to comply with anti-money laundering and recordkeeping requirements. Legitimate Interest (Article 6(1)(f) GDPR) for fraud prevention, business analytics, and improving our services. Data subjects located in the EU/EEA have the right to access, rectify, erase, restrict, object to, or port their data. Requests can be submitted to support@mysurefunds.com.
- 3. Log Data We collect log data such as IP addresses, browser type, access time, and pages visited to improve the Site and ensure security.
- 4. Cookies and Tracking Technologies Our Site uses cookies and similar tracking technologies to enhance user experience, analyze traffic, and personalize content. Cookies are small files stored on your device. You can control or disable cookies through your browser settings. If you reject cookies, some parts of the Site may not function properly. Types of cookies we may use include: Essential cookies: Required for website functionality. Analytics cookies: To understand how users interact with the Site. Preference cookies: To remember your settings. Marketing cookies: Used for advertising and remarketing (only with consent if GDPR applies).
- 5. Data Retention Personal data will be retained for as long as necessary to fulfill the purposes outlined in this Policy, or as required by law. Account-related data may be kept for at least five years following account closure to comply with recordkeeping and anti-money laundering obligations.
- 6. Security We take reasonable technical and organizational measures to protect personal data. However, no transmission over the internet is completely secure, and we cannot guarantee absolute protection.
- 7. International Data Transfers If GDPR applies, and personal data of EU/EEA users is transferred outside the EEA, we ensure adequate safeguards are in place, such as Standard Contractual Clauses or equivalent mechanisms.





- 8. Policy Updates We may update this Policy periodically. Any significant changes will be posted on this page, and where appropriate, notified via email.
- 9. Contact Us If you have any questions regarding this Policy or your personal data, please contact us at: Email: support@mysurefunds.com Trilogy Ventures Ltd www.mysurefunds.com





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