

# OMEN FUNDED TRADING PRIVACY NOTICE

**Last Updated:** May 27, 2026

Welcome to Omen Funded Trading. This Privacy Notice explains how Dory TradeCo Ltd., a Cayman Islands exempted company (“we”, “us”, or “our”), collects, uses, discloses, and otherwise processes personal data in connection with mobile apps, websites and any other online service referencing or linking to this Privacy Notice. For the purposes of the Data Protection Act (2021 Revision) of the Cayman Islands (the “DPA”), we may act as a data controller in respect of the personal data we process. In some circumstances, we may process personal data jointly for shared operational, administrative, compliance and service delivery purposes. You may contact us at [support@nemotrading.xyz](mailto:support@nemotrading.xyz).

This Privacy Notice does not address our privacy practices relating to Omen job applicants, employees and other employment-related individuals, nor data that is not subject to applicable data protection laws (such as deidentified or publicly available information in certain jurisdictions). This Privacy Notice is also not a contract and does not create any legal rights or obligations not otherwise provided by law.

## Basis for Processing Personal Data

Under the DPA, we must have a lawful basis for processing your personal data. The lawful bases we rely on include: (a) your consent; (b) the performance of a contract with you or steps taken at your request prior to entering into a contract; (c) compliance with a legal obligation to which we are subject; (d) the protection of your or another person’s vital interests; and (e) our legitimate interests (or those of a third party), provided these are not overridden by your rights and freedoms. The specific lawful basis we rely on depends on the processing activity and is available upon request.

## Our Collection and Use of Personal Data

The categories of personal data we collect depend on how you interact with us and our services. For example, you may provide us your personal data directly when you sign up for our mailing list, register for an account, make a trade, post a review, participate in an event, contest, promotion or survey or otherwise contact us or interact with us.

We also collect personal data automatically when you interact with our websites and other services and may also collect personal data from other sources and third parties.

Our services may evolve over time, and the nature of the personal information we collect and process may change accordingly, subject to this Privacy Notice and applicable law.

## Personal Data Provided by Individuals

We collect the following categories of personal data individuals provide us:

- **Account Information**, including first and last name, email address, phone number, and account credentials or one-time passcodes. In some instances, we may collect your wallet address when you have been approved for Signal Provider status. We use this information primarily to administer your account, provide you with access to demo accounts, communicate with you regarding your account and your use of our services, and for support purposes.
- **Contact Information**, including phone number, email address, mailing address, and communication preferences. We use this information primarily to fulfill your request or transaction, to communicate with you directly, and to send you marketing communications in accordance with your preferences.
- **Know Your Customer Information**, such as date of birth, proof of address, government-issued identification numbers, and the results of automated checks, including sanctions screening and a liveness check. We use this information to verify your identity and confirm your eligibility to use our services.
- **Simulated Transaction Information**, including simulated transaction amount, type and nature of the simulated transaction, and time and date of the simulated transaction. We use this information to process and administer

simulated transactions, assess your performance on evaluations or challenges, maintain simulated transaction records, provide and improve our services, detect and prevent fraud, comply with legal and regulatory obligations, and otherwise manage our relationship with you.

- **Professional Information**, including job title, company name, professional background, and the nature of your relationship with us. We use this information primarily to fulfill your request or transaction, to determine how we communicate with you, to administer your account, to provide you with our services, and for contractor support purposes.
- **Uploaded Content**, including any files, documents, audio, videos, images, data, or communications you choose to input, upload, or transmit to our services. We use this content primarily to provide you with our services, to facilitate your requests, and to improve our services (including by training or fine-tuning our and our third-party providers' artificial intelligence and machine learning models).
- **Payment Information**, including wallet address. We use this information for KYC purposes and to provide Signal Providers compensation or profit allocation.
- **Event, Promotion, and Survey Information**, including information provided when you sign up for an event, enter a promotion, complete a survey or submit a testimonial. We use this information primarily to administer and facilitate our services, respond to your submission, communicate with you, conduct market research, inform our marketing and advertising activities, improve and grow our business, and facilitate the related event, promotion, or survey.
- **Security-Related Information**, including name and contact information of visitors to our premises, video recordings of videos on our premises, and electronic login records and access details when a visitor utilizes company technology on our premises. We use this information primarily to protect the security of our premises, employees, and our company.
- **Feedback and Support Information**, including the contents of custom messages sent through the forms, chat platforms, including our online live chat or automated chat functions, email addresses, or other contact information we make available to users, as well as recordings of calls with us, where permitted by law (including through the use of automated or artificial intelligence tools provided by us or our third-party providers). We use this information primarily to investigate and respond to your inquiries, to communicate with you via online chat, email, phone, text message or social media, and to improve our services.

We take reasonable steps to limit the personal data we collect to what is necessary for the purposes described in this Privacy Notice; however, due to the nature of our services, certain data collection may be inherent to system functionality.

If you do not provide personal data that is required for us to provide our products or services or to comply with legal, regulatory, tax or compliance obligations, we may be unable to onboard or engage with you, transact with you, provide the relevant products or services, process rewards or distributions, or otherwise respond to your request.

### **Personal Data Automatically Collected**

We, and our third-party partners, automatically collect information you provide to us and information about how you access and use our services when you engage with us. We typically collect this information through the use of a variety of our own and our third-party partners' automatic data collection technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. Information we collect automatically about you may be combined with other personal data we collect directly from you or receive from other sources. We may use IP address, device, network, location and related technical information to assess eligibility, enforce geographic and jurisdictional restrictions, detect attempts to circumvent access controls, comply with sanctions and other legal or regulatory requirements, and protect us from being regarded as carrying on regulated activity in any jurisdiction.

We, and our third-party partners, use automatic data collection technologies to automatically collect the following data when you use our services or otherwise engage with us:

- **Information About Your Device and Network**, including the device type, manufacturer, and model, operating system, IP address, browser type, Internet service provider, and unique identifiers associated with you, your device, or your network (including, for example, a persistent device identifier or advertising ID). We employ third-party technologies designed to allow us to recognize when two or more devices are likely being used by the same individual and may leverage these technologies (where permitted by law) to link information collected from different devices.
- **Information About the Way Individuals Use Our Services and Interact With Us**, including the site from which you came, the site to which you are going when you leave our services, how frequently you access our services,

whether you open emails or click the links contained in emails, whether you access our services from multiple devices, and other browsing behavior and actions you take on our services (such as the pages you visit, the content you view, videos you watch, the communications you have through our services, and the content, links and ads you interact with). We employ third-party technologies designed to allow us to collect detailed information about browsing behavior and actions that you take on our services, which may record your mouse movements, scrolling, clicks, and keystroke activity on our services and other browsing, search or purchasing behavior. These third-party technologies may also record information you enter when you interact with our products or services, or engage in chat features or other communication platforms we provide.

- **Information About Your Location**, including general geographic location that we or our third-party providers may derive from your IP address.

All of the information collected automatically through these tools allows us to improve your experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our services, to offer communications features, and to improve the effectiveness of our products, services, offers, advertising, communications and user service. We may also use this information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our services.

For information about the choices you may have in relation to our use of automatic data collection technologies, please refer to the [Your Privacy Choices](#) section below.

### **Personal Data from Other Sources and Third Parties**

We may receive the same categories of personal data as described above from the following sources and other parties:

- **Affiliates**: We may receive personal data from other entities and any affiliated entities where this is necessary for shared administration, compliance, service delivery, account management, internal reporting, risk management, and other purposes consistent with this Privacy Notice.
- **Service Providers**: We may receive personal data from service providers that perform services on our behalf, such as KYC, analytics, communications, identity verification, compliance, payment, survey, hosting and marketing providers, where this is necessary for the provision, operation, security, support or improvement of our products and services. For example, we receive personal data you may submit in response to requests for KYC verification requirements or feedback to our survey providers.
- **Third-Party Technology and Compliance Providers**: We may receive personal data from non-affiliated, technology, infrastructure, analytics, identity verification, wallet-screening, compliance, hosting, support and other service providers that support the operation, security, availability and compliance of our services. Such parties may provide us with personal data to support account administration, KYC and eligibility checks, sanctions and wallet screening, fraud prevention, security monitoring, technical support, compliance with legal and regulatory obligations, and management of our relationship with you, such as name, contact data, inferences about your preferences and attributes, and inferred fraud risk from identity verification and fraud prevention partners.
- **Financial Account Linking**: We may receive financial account information about you from third parties, such as wallet providers.
- **Single Sign-On**: We may provide you the ability to log in to our services through certain third-party accounts you maintain. When you use these single sign-on protocols to access our services, we do not receive your login credentials for the relevant third-party service. Instead, we receive tokens from the single sign-on protocol to help identify you in our system (such as by your username) and confirm you successfully authenticated through the single sign-on protocol. This information allows us to more easily provide you access to our services.
- **Mobile Sign-On**: We may provide you the ability to log in to our mobile applications or authenticate yourself using facial, fingerprint, or other biometric recognition technology available through your mobile device. If you choose to utilize these login features, information about your facial geometry, your fingerprint, or other biometric information will be collected by your mobile device for authentication purposes. We do not store or have access to this biometric information. Instead, your mobile device will perform the biometric authentication process and only let us know whether the authentication was successful. If the authentication was successful, you will be able to access the

applicable mobile application or feature without separately providing your credentials. For more details, please refer to the biometric authentication guides offered by your device provider.

- **Employers:** If you interact with our services in connection with your employment, we may obtain personal data about you from your employer or another company for which you work. For example, we may obtain your contact information from your employer to allow us to communicate with you about your employer's relationship with us.
- **Other Users:** We may receive your personal data from our other users. For example, a user may provide us with your contact information as a part of a referral.
- **Social Media:** When you interact with our services through other social media networks, such as when you follow us or share our content on other social networks, we may receive some information that you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network, and may include profile information, profile picture, username, and any other information you permit the social network to share with third parties. You should always review and, if necessary, adjust your privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information primarily to operate, maintain, and provide to you the features and functionality of our services, as well as to communicate directly with you, such as to send you messages about features that may be of interest to you.
- **Advertisers, Influencers, and Publishers:** We engage in advertising through third-party services. Advertisers, influencers, and publishers may share personal data with us in connection with our advertising efforts. For example, we may obtain information about whether an advertisement on our services led to a successful engagement between you and a third-party advertiser.
- **Other Sources:** We may also collect personal data about you from other sources, including publicly available sources, third-party data providers, or through transactions such as mergers and acquisitions.
- **Inferences:** We may generate inferences or predictions about you and your interests and preferences based on the other personal data we collect and the interactions we have with you.

You acknowledge that any use of our services, including any features involving data processing, analytics, or AI-generated outputs, is undertaken at your own risk, and that we are not responsible for how you interpret, use, or rely on any such outputs.

Nothing in this Privacy Notice shall be construed as creating any fiduciary, advisory, or special confidentiality relationship between you and us beyond those required by applicable law.

### **Additional Uses of Personal Data**

In addition to the primary purposes for using personal data described above, we may also use personal data we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to facilitate payment for our services, or to deliver the services requested;
- Make automated decisions about you, including using artificial intelligence without initial human input, to evaluate your personal circumstances and other factors to predict risks or outcomes, such as fraud detection and KYC checks;
- Manage our organization and its day-to-day operations;
- Verify your identity and eligibility for our products and services, including as may be required for Know Your Customer (“**KYC**”), anti-money laundering (“**AML**”), and other legal and regulatory due diligence requirements;
- Communicate with you, including via email, text message, chat, social media and/or telephone calls;
- Facilitate the relationship we have with you and, where applicable, the company you represent;
- Request you provide us feedback about our product and service offerings;
- Address inquiries or complaints made by or about an individual in connection with our products or services;
- Create and maintain accounts for our users;
- Verify your identity and entitlement to our services;

- Register you for and provide you access to events, sweepstakes, and surveys;
- Market our services to you, including through email, text message, push notification, and social media;
- Administer, improve, and personalize our services, including by recognizing you and remembering your information when you return to our services;
- Develop, operate, improve, maintain, protect, and provide the features and functionality of our services (including by training or fine-tuning our and our third-party providers’ artificial intelligence and machine learning models);
- Identify and analyze how you use our services;
- Infer additional information about you from your use of our services, such as your interests;
- Create aggregated or de-identified information that cannot reasonably be used to identify you, which information we may use for purposes outside the scope of this Privacy Notice;
- Conduct research and analytics on our user base and our services, including to better understand the demographics of our users;
- Improve and customize our services to address the needs and interests of our user base and other individuals we interact with;
- Test, enhance, update, and monitor the services, or diagnose or fix technology problems;
- Help maintain and enhance the safety, security, and integrity of our property, products, services, technology, assets, and business;
- Defend, protect, or enforce our rights or applicable contracts and agreements (including our [Terms of Service](#)), as well as to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Detect, prevent, investigate, or provide notice of security incidents or other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Omen Funded Trading and others;
- Facilitate business transactions and reorganizations impacting the structure of our business;
- Comply with contractual and legal obligations and requirements;
- Fulfill any other purpose for which you provide your personal data, or for which you have otherwise consented.

As noted above, we may use your personal data to improve our services and train or fine-tune the artificial intelligence and machine learning models that power our platform and services.

## Our Disclosure of Personal Data

We disclose or otherwise make available personal data in the following ways:

- **Third-Party Technology and Compliance Providers:** We may disclose personal data to non-affiliated technology, infrastructure, analytics, identity verification, wallet-screening, compliance, hosting, support and other service providers where reasonably necessary to operate, secure, support, monitor and improve our services, administer accounts, conduct eligibility and compliance checks, and comply with applicable law.
- **Authorized Service Providers:** We disclose information about you with vendors who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, tax and accounting services, contest fulfillment, web hosting, marketing, advertising, and analytics services.
- **To Your Employer:** If you interact with our services in connection with your employment, we may disclose personal data to your employer or another company for which you work. For example, we may provide information to your employer about your usage of our services in connection with your work for them.
- **To Marketing Providers:** We coordinate and share personal data with our marketing providers in order to advertise and communicate with you about the services we make available.
- **To Ad Networks and Advertising Partners:** We work with third-party ad networks and advertising partners to deliver advertising and personalized content on our services, on other websites and services, and across other devices. These parties may collect information automatically from your browser or device when you visit our

websites and other services through the use of cookies and related technologies. This information is used to provide and inform targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

- **To Business Partners:** We may share personal data with our business partners, or we may allow our business partners to collect personal data directly from you in connection with our services. Our business partners may use your personal data for their own business and commercial purposes, including to send you information about their services.
- **In Connection with a Business Transaction or Reorganization:** We may take part in or be involved with a business transaction or reorganization, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose, transfer, or assign personal data to a third party during negotiation of, in connection with, or as an asset in such a business transaction or reorganization. Also, in the unlikely event of our bankruptcy, receivership, or insolvency, your personal data may be disclosed, transferred, or assigned to third parties in connection with the proceedings or disposition of our assets.
- **To Facilitate Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
  - in connection with the establishment, exercise, or defense of legal claims;
  - to comply with laws or to respond to lawful requests and legal process;
  - to protect our rights and property and the rights and property of our agents, contractors, and others, including to enforce our agreements, policies, and terms of use;
  - to detect, suppress, or prevent fraud;
  - to reduce credit risk and collect debts owed to us;
  - to protect the health and safety of us, our contractors, or any person; or
  - as otherwise required by applicable law.
- **With Your Consent or Direction:** We may disclose your personal data to certain other third parties or publicly with your consent or direction. For example, with your permission, we may post your testimonial on our websites.

## **Retention of Personal Data**

We retain personal data for as long as reasonably necessary for the purposes described in this Privacy Notice, including to provide and administer our services, maintain business records, comply with legal, regulatory, tax, accounting, sanctions, AML/CTF and compliance obligations, resolve disputes, enforce our agreements, prevent fraud and abuse, and protect our rights, users, systems and business. We may retain certain information for longer where required or permitted by applicable law, including where deletion would impair legal, regulatory, security, fraud-prevention or compliance obligations.

## **Your Privacy Choices**

### **Communication Preferences**

- **Email Communication Preferences:** You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in any of our email communications. Please note you cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).
- **Mobile Communication Preferences:** You can stop receiving promotional phone communications from us by informing the caller you no longer wish to receive promotional phone calls from us, following the instructions provided on the call for opting out of promotional phone calls (where available), or replying STOP to any one of our promotional text messages. Please note we may need to continue to communicate with you via phone for certain service-related messages (such as, sending a verification code to your phone via call or text for purposes of verifying the authenticity of a log-in attempt).

- **Push Notification Preferences:** You can stop receiving push notifications from us by changing your preferences in your device’s notification settings menu or in the applicable service-specific application. Please note we do not have any control over your device’s notifications settings and are not responsible if they do not function as intended.

## **Withdrawing Your Consent**

Where we have your consent for the processing of your personal data (e.g., when you opt in to receive certain types of marketing communications from us), you may withdraw your consent by following the instructions provided when your consent was requested or by contacting us as set forth in the [Contact Us](#) section below.

## **Automatic Data Collection Preferences**

You may be able to utilize third-party tools and features to restrict our use of automatic data collection technologies. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking automatic data collection technologies through third-party tools and features may negatively impact your experience using our services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

## **Targeted Advertising Preferences**

We may engage third parties to help us facilitate targeted advertising designed to show you personalized ads based on predictions of your preferences and interests developed using personal data we maintain and personal data our third-party partners obtain from your activity over time and across nonaffiliated websites and other services. The data we and our third-party partners use for purposes of facilitating targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research, are primarily collected through the use of a variety of automatic data collection technologies, including cookies, web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help link the personal data we and our third-party partners collect to the same person, or otherwise target advertising to an individual on a third-party website or platform.

In addition to taking the steps set forth in the [Automatic Data Collection Preferences](#) section above, you may be able to further exercise control over the advertisements that you see by leveraging one or more targeted advertising opt-out programs. For example:

- **Device-Specific Opt-Out Programs:** Certain devices provide individuals the option to turn off targeted advertising for the entire device (such as Apple devices through their App Tracking Transparency framework or Android devices through their opt out of ads personalization feature). Please refer to your device manufacturer’s user guides for additional information about implementing any available device-specific targeted advertising opt-outs.
- **Digital Advertising Alliance:** The [Digital Advertising Alliance](#) allows individuals to opt out of receiving online interest-based targeted advertisements from companies that participate in their program. Please follow the instructions at <https://optout.aboutads.info/?c=2&lang=EN> for browser-based advertising and <https://www.youradchoices.com/appchoices> for app-based advertising to opt out of targeted advertising carried out by our third-party partners and other third parties that participate in the Digital Advertising Alliance’s self-regulatory program.
- **Network Advertising Initiative:** The [Network Advertising Initiative](#) also provides individuals instructions for further controlling how information is used for online advertising. Please follow the instructions at <https://thenai.org/how-to-opt-out/> to exercise these controls.
- **Platform-Specific Opt-Out Programs:** Certain third-party platforms provide individuals the option to turn off targeted advertising for the entire platform (such as certain social media platforms). Please refer to your platform provider’s user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.

Please note that when you opt out of receiving interest-based advertisements through one of these programs, this does not mean you will no longer see advertisements from us or on our services. Instead, it means that the online ads you do see from relevant program participants should not be based on your interests. We are not responsible for the effectiveness of,

or compliance with, any third parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, program participants may still use automatic data collection technologies to collect information about your use of our services, including for analytics and fraud prevention as well as any other purpose permitted under the applicable advertising industry program.

## **Modifying or Deleting Your Personal Data**

If you have any questions about reviewing, modifying, or deleting your personal data, you can contact us as set forth in the [Contact Us](#) section below. We may not be able to modify or delete your personal data in all circumstances.

## **Partner-Specific Preferences**

Certain of our third-party providers and partners offer additional ways that you may exercise control over your personal data, or automatically impose limitations on the way we can use personal data in connection with the services they provide:

- **Device-Specific / Platform-Specific Preferences:** The device and/or platform you use to interact with us (such as your mobile device or social media provider), may provide you additional choices with regard to the data you choose to share with us. For example, many mobile devices allow you to change your device permissions to prevent our services from accessing certain types of information from your device (such as your contact lists), and many social media platforms allow you to change your platform permissions to prevent integrated services from accessing certain types of information connected with your profile. Please refer to your device or platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.
- **Google Analytics:** Google Analytics allows us to better understand how our website visitors interact with our services. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website here: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Add-On here: <https://tools.google.com/dlpage/gaoptout/>. We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to our services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://myadcenter.google.com/?ref=help-center>.

## **Children's Personal Data**

Individuals under the age of 18, or below the age of majority in which individuals can enter into legally binding contracts in the jurisdiction where they are using the platform or platform services, as applicable, are not permitted to subscribe to any of our services.

Our services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 18. If an individual is under the age of 18, they should not use our services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 18 has provided personal data to us, we encourage the child's parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a child under the age of 18, we will promptly delete that personal data.

## **Security of Personal Data**

We have implemented reasonable physical, technical, and organizational safeguards that are designed to protect your personal data. In addition, we take steps designed to ensure any third party with whom we share personal data provides a similar level of protection. However, despite these controls, we cannot completely ensure or warrant the security of your personal data. Although we take steps designed to protect personal data, no method of transmission or storage is completely secure. To the fullest extent permitted by applicable law, we shall not be liable for any unauthorized access to, loss of, misuse of or alteration of personal data, except to the extent such liability cannot be excluded under applicable law.

## **Third-Party Websites and Services**

Our websites and other services may include links to or redirect you to third-party websites, plug-ins, applications, or other services, including social media services where you may connect with us. Third-party websites and other services may also reference or link to our websites and services. This Privacy Notice does not apply to any personal data practices of these third-party websites, plug-ins, applications, or other services. To learn about these third parties' personal data practices, please visit their respective privacy notices.

## **California's Shine the Light Law**

California's "Shine the Light" law (Civil Code Section §1798.83) provides certain rights to California residents that have an established business relationship with us with regard to the disclosure of certain types of personal information to third parties for their direct marketing purposes. It is company policy that we do not disclose personal information to third parties for their direct marketing purposes if a consumer has exercised their right to opt out. To opt out of having your personal information disclosed to third parties for their direct marketing purposes, please contact us by following the instructions under the Contact Us section of this Privacy Notice.

## **International Transfers of Personal Data**

We are incorporated in the Cayman Islands and may process personal data in the Cayman Islands and in other jurisdictions where we, our affiliates, service providers, contractors or professional advisers operate. If personal data is transferred from the Cayman Islands to another jurisdiction, we will take steps designed to ensure that the transfer is made in accordance with applicable law, including by relying on consent, contractual protections, appropriate safeguards, or another basis permitted by the DPA.

Where we transfer personal data internationally, we ensure that appropriate safeguards are in place in accordance with the eighth data protection principle of the DPA, including through the use of standard contractual clauses, adequacy assessments, or other transfer mechanisms recognized under the DPA.

The jurisdictions in which personal data is processed may have data protection laws that differ from those in your jurisdiction, and personal data may be accessible to courts, law enforcement, regulators, governmental authorities or other competent authorities in those jurisdictions where permitted or required by applicable law.

## **Updates to This Privacy Notice**

We may update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify individuals by email to their registered email address, by prominent posting on this website or our other platforms, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

## **Contact Us**

If you have any questions, complaints or requests in connection with this Privacy Notice or our processing of personal data, please contact us at: [support@nemotrading.xyz](mailto:support@nemotrading.xyz). We will consider and respond to your request in accordance with applicable law.

## ADDITIONAL CAYMAN ISLANDS PRIVACY DISCLOSURES

These disclosures supplement the information contained in our [Privacy Notice](#) by providing additional information about the privacy rights available to individual residents of the Cayman Islands and our personal data processing practices relating to those individuals. For a detailed description of how we collect, use, disclose, and otherwise process personal data, please read our [Privacy Notice](#).

### **Your Rights Under the DPA**

Under the DPA, you have the following rights in relation to your personal data:

- **Right of access:** You have the right to request a copy of your personal data and information about how we use it. We will respond to your request within 30 days.
- **Right to rectification:** You have the right to request that we correct any inaccurate personal data we hold about you.
- **Right to stop or restrict processing:** You have the right to require us to stop or restrict the processing of your personal data in certain circumstances.
- **Right to stop direct marketing:** You have an absolute right to require us to stop processing your personal data for direct marketing purposes at any time.
- **Rights relating to automated decision-making:** Where a decision that significantly affects you is based solely on automated processing, you have the right to require us to reconsider the decision on a different basis.
- **Right to complain:** You have the right to lodge a complaint with the Cayman Islands Office of the Ombudsman if you believe that we have processed your personal data in violation of the DPA. The Ombudsman can be contacted at: Office of the Ombudsman, PO Box 2252, Grand Cayman KY1-1107, Cayman Islands; website: [www.ombudsman.ky](http://www.ombudsman.ky); email: [info@ombudsman.ky](mailto:info@ombudsman.ky).

To exercise any of your rights, please contact us as set forth in the Contact Us section of our [Privacy Notice](#). Certain rights may be subject to exemptions or limitations under the DPA.