



Privacy Policy

Zora Capital Limited

1. Introduction

This Privacy Policy explains how Zora Capital Limited (“Company”, “we”, “us”, or “our”) collects, uses, stores, discloses, and protects personal data obtained from clients and website visitors (“Client”, “you”, or “your”).

This Privacy Policy applies to all personal data collected directly or indirectly, including via third-party service providers acting on behalf of the Company, through:

- The Company’s website(s);
- Trading platforms;
- Client portal and dashboards;
- Communication channels including email, live chat, phone, and ticketing systems;
- Any services provided by the Company.

By accessing the Company’s services or website, you acknowledge that you have read, understood, and accepted this Privacy Policy.

2. Regulatory Status and Jurisdiction

The Company is incorporated in Saint Lucia and is not licensed or regulated by any European, UK, USA, or Tier-1 financial regulatory authority.

Clients acknowledge that data protection standards applicable in regulated jurisdictions may not apply in full; however, the Company applies commercially reasonable data protection principles consistent with internationally recognized standards, to the extent practicable.

3. Personal Data Collected

The Company may collect and process the following categories of personal data:

3.1 Identification and KYC Data

- Full name, date of birth, nationality;
- Government-issued identification documents;
- Proof of address;
- Selfies, video verification, and biometric verification data (where applicable).

Note: Biometric data is collected solely for identity verification, fraud prevention, and compliance purposes and is not used for profiling or marketing.

3.2 Account and Financial Information

- Trading account details;
- Transaction history;
- Deposit and withdrawal records;
- Payment method details (processed via third-party providers).



3.3 Technical and Usage Data

- IP address, device identifiers, browser type;
- Login timestamps and session data;
- Platform activity and trading behavior.

3.4 Communication Data

- Emails, chat transcripts, call recordings;
- Support tickets and complaint records.

Failure to provide requested personal data may result in service limitations, suspension, or refusal.

4. Purpose of Data Processing

The Company processes personal data for the following purposes:

- Client onboarding, verification, and compliance checks;
- Account management and service delivery;
- Order execution and transaction processing;
- Fraud prevention, risk management, and security monitoring;
- Compliance with legal, regulatory, or contractual obligations;
- Internal analytics, system improvement, and service optimization (on an aggregated or anonymized basis where reasonably possible);
- Communication with Clients regarding accounts, services, or notices.

The Company does not sell personal data to third parties.

5. Legal Basis for Processing

Personal data is processed based on one or more of the following grounds:

- Performance of a contract;
- Compliance with legal obligations;
- Legitimate business interests;
- Client consent, where required.

Certain processing activities may continue notwithstanding withdrawal of consent where required by law, regulatory obligations, or legitimate interests. Clients acknowledge that withdrawal of consent may affect the availability of services.

6. Data Sharing and Disclosure

The Company may share personal data with:

- Liquidity providers, platform providers, and technology vendors;
- Payment service providers and financial institutions;
- Identity verification and compliance service providers;
- Professional advisors, auditors, and legal consultants;
- Governmental, regulatory, or law enforcement authorities when required.

Data may be transferred across jurisdictions. By using the Company's services, the Client expressly acknowledges and accepts the risks associated with cross-border data transfers. The Company does not guarantee that foreign jurisdictions offer the same level of data protection.



7. Data Retention

Personal data is retained only for as long as necessary to fulfill its purposes, including:

- Regulatory, legal, and compliance obligations;
- Dispute resolution;
- Fraud prevention and risk management.

The Company may retain data after account closure where legally or operationally required.

Retention periods are determined based on regulatory requirements, limitation periods, and the nature of the relationship.

8. Data Security

The Company implements reasonable administrative, technical, and organizational measures to protect personal data.

Clients acknowledge that no system is completely secure. The Company does not guarantee absolute security and shall not be liable for unauthorized access beyond its reasonable control.

9. Client Rights

Subject to applicable laws, Clients may request:

- Access to their personal data;
- Correction of inaccurate or incomplete data;
- Deletion of personal data, where legally permissible;
- Restriction or objection to certain processing activities.

The Company may refuse requests that conflict with legal obligations, regulatory requirements, or legitimate business interests, to the extent permitted by applicable law.

10. Cookies and Tracking Technologies

The Company may use cookies and similar technologies to:

- Improve website functionality;
- Analyze usage patterns;
- Enhance user experience.

Clients may manage cookie preferences through browser settings. Disabling cookies may affect website functionality.

11. Third-Party Websites and Services

The Company is not responsible for the privacy practices of third-party websites, plugins, or services linked to or integrated with its platforms.

Clients access such services at their own risk.

12. Amendments to This Privacy Policy

The Company may amend this Privacy Policy at any time.

Where material changes are made, the Company may provide notice via its website or client portal. Updated versions become effective upon publication. Continued use of services constitutes acceptance of the revised Privacy Policy.



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13. Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of Saint Lucia, without regard to conflict-of-law principles.

14. Contact

Questions regarding this Privacy Policy may be submitted through the Company's official communication channels.