

VINAEX

Privacy Policy

How we collect, use, protect and manage your personal information

Item	Details
Version	2.1
Effective	1 April 2026
Last revised	1 April 2026
Jurisdiction	Ontario, Canada
Contact	support@vinaex.net

IMPORTANT: Please read this Privacy Policy carefully before using the Vinaex platform. By registering an account or accessing any part of the platform, you confirm that you have read and understood this Policy and agree to the collection and use of your information as described herein.

1. Introduction

Vinaex ("we", "us", "our") is a financial education and market analytics platform operated by Vinaex Inc., registered in Ontario, Canada. This Privacy Policy explains in detail how we collect, use, store, disclose and protect personal information provided by users ("you", "your") when accessing or using the Vinaex platform, including our website, mobile applications, and all associated services.

We are committed to processing your personal information lawfully, fairly, and transparently. This Policy has been prepared in compliance with applicable privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and, where applicable, the General Data Protection Regulation (GDPR).

This Policy applies to all users of the Vinaex platform regardless of geographic location. Where local privacy laws impose stricter requirements than those described in this Policy, those requirements will apply to users in the relevant jurisdiction.

We do not sell, rent, or trade your personal information to any third party under any circumstances whatsoever.

2. Data Controller

The data controller responsible for your personal information is:

Item	Details
Company name	Vinaex Inc.
Registered address	940 Winterton Way, Mississauga, ON L5V 2M2, Canada
Email	support@vinaex.net
Phone	+1 905-210-3928
Data Protection Officer	Available upon written request

If you have any questions about how we handle your personal information or wish to exercise any of your privacy rights, please contact us using the details above.

3. Information We Collect

We collect personal information through several channels. The nature of information collected depends on your interaction with the platform.

3.1 Information You Provide Directly

When you register an account or use the platform, you may provide:

- Full legal name (first name and last name)
- Email address — used as your primary account identifier
- Phone number — including country code and local number
- Country of residence — used to determine applicable terms and regulatory requirements
- Identity verification documents — where required by applicable law or our compliance obligations
- Financial information — where necessary to process deposits, withdrawals or verify account status
- Communication preferences and notification settings
- Support requests, feedback and any correspondence directed to our team

3.2 Information Collected Automatically

When you access the platform, certain technical information is collected automatically:

- IP address and derived approximate geographic location (country and region level only)
- Device type, model, manufacturer and operating system version
- Browser type, version and language settings
- Mobile application version and device identifiers

- Session data — login times, session duration and logout events
- Feature usage patterns — which tools, pages and sections you interact with
- Error logs and crash reports to support platform stability
- Referral source — how you discovered and arrived at the platform

3.3 Information from Third Parties

We may receive information about you from trusted third-party service providers in limited circumstances:

- Identity verification services — to confirm the authenticity of documents you provide
- Analytics providers — aggregated and anonymised platform usage data
- Marketing and attribution partners — to understand how users discover the platform

All third-party providers are required to handle your data in accordance with applicable privacy laws and are bound by appropriate data processing agreements.

4. Legal Basis for Processing

Where the GDPR or equivalent legislation applies, we process your personal information under one or more of the following legal bases:

Item	Details
Contract performance	Processing necessary to create and manage your account and provide the services you have requested.
Legitimate interests	Processing necessary for our legitimate business interests, such as fraud prevention, security monitoring and platform improvement, provided such interests are not overridden by your rights.
Legal obligation	Processing required to comply with applicable laws and regulations, including anti-money laundering, KYC requirements and tax obligations.
Consent	For optional communications such as newsletters and marketing updates, where you have given explicit consent. You may withdraw consent at any time.

5. How We Use Your Information

We use the personal information we collect for the following specifically defined purposes:

5.1 Account Management and Platform Access

- Creating and maintaining your user account
- Authenticating your identity on each login

- Providing access to all platform features, tools and educational content
- Processing account-related requests, including password resets and account modifications

5.2 Service Delivery and Support

- Delivering real-time market data and analytical tools
- Processing deposits, withdrawals and financial transactions
- Providing customer support and responding to enquiries
- Sending service-related communications, including account confirmations and security alerts

5.3 Safety, Security and Compliance

- Detecting, preventing and investigating fraudulent or suspicious activity
- Monitoring for unauthorised access attempts and security breaches
- Verifying user identities in accordance with KYC obligations
- Complying with anti-money laundering (AML) legislation
- Responding to lawful requests from regulatory and law enforcement authorities

5.4 Platform Improvement

- Analysing aggregated usage patterns to improve platform performance and usability
- Conducting internal research and data analysis
- Testing and deploying new features and functionality
- Resolving bugs and technical issues

5.5 Communications (with consent)

- Sending newsletters, market updates and educational content where you have opted in
- Providing information about new features, promotions and platform developments
- Personalising content and recommendations based on your usage patterns

You may unsubscribe from optional communications at any time by adjusting your notification settings in your account dashboard, or by contacting support@vinaex.net.

6. Data Security

We implement comprehensive technical and organisational security measures to protect your personal information against unauthorised access, disclosure, alteration, or destruction.

6.1 Technical Measures

- AES-256 encryption for all data stored on our servers
- TLS 1.3 encryption for all data transmitted between your device and our servers
- Mandatory two-factor authentication (2FA) for all user accounts
- Encrypted storage for sensitive credentials and financial information
- Automated intrusion detection and real-time anomaly monitoring
- Secure, isolated environments for payment and financial data processing

6.2 Organisational Measures

- Strict role-based access controls — data accessible only to authorised personnel on a need-to-know basis
- Mandatory data protection training for all employees with access to personal data
- Confidentiality agreements for all staff, contractors and third-party service providers
- Regular security audits, vulnerability assessments and penetration testing
- Documented incident response procedures for data breach scenarios

No method of transmission over the internet or method of electronic storage is 100% secure. While we apply all reasonable measures to protect your data, we cannot guarantee absolute security against all possible threats. In the event of a data breach affecting your rights, we will notify you and the relevant authorities as required by law.

7. Data Sharing and Disclosure

We do not sell your personal information. We disclose personal data only in the following strictly limited and defined circumstances:

7.1 Service Providers

We engage trusted third-party service providers to assist in operating the platform. These providers are permitted to use personal data only as necessary to perform their contracted services and are bound by:

- Comprehensive data processing agreements in accordance with applicable law
- Strict confidentiality obligations
- Prohibition on using data for any purpose other than the contracted service

Categories of service providers include: cloud infrastructure, identity verification, payment processing, analytics, customer support tools, and security monitoring.

7.2 Legal and Regulatory Obligations

We may disclose personal information when required to do so by law or in response to:

- Court orders, subpoenas or other legally binding judicial process
- Requests from competent regulatory or government authorities

- Requirements under anti-money laundering (AML) or counter-terrorism financing legislation
- Legal proceedings in which we are a party

7.3 Business Transfers

In the event of a merger, acquisition, sale of assets, or reorganisation of our business, your personal information may be transferred to the acquiring entity. We will provide prior notice of any such transfer and ensure that the acquiring entity is bound by privacy protections no less protective than those in this Policy.

7.4 With Your Consent

We may share your information for any other purpose with your prior explicit written consent. You may withdraw such consent at any time by contacting us.

8. International Data Transfers

The Vinaex platform serves users globally. Your personal information may be processed and stored in countries outside your country of residence, including Canada, the United States and member states of the European Economic Area.

Where personal data is transferred outside the jurisdiction in which it was collected, we ensure that appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission for transfers from the EEA
- Adequacy decisions issued by relevant data protection authorities
- Binding Corporate Rules where applicable
- Other lawful transfer mechanisms recognised under applicable privacy legislation

9. Data Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law and regulation.

Item	Details
Account data	Duration of account plus 5 years after account closure
Financial transaction records	7 years as required by applicable tax and financial legislation

Item	Details
KYC / identity documents	5 years after the end of the business relationship, or longer if required by law
Support communications	3 years from the date of the interaction
Technical logs	12 months on a rolling basis
Marketing preferences	Until consent is withdrawn or account is closed

When data is no longer required, we securely delete or irreversibly anonymise it in accordance with our internal data disposal procedures. You may request earlier deletion subject to our legal obligations — see Section 10 for details.

10. Your Privacy Rights

Depending on your jurisdiction, you may have the following rights regarding your personal information. We will respond to all valid requests within 30 days.

Item	Details
Right of Access	Request a copy of all personal information we hold about you, including the purposes for which it is processed.
Right to Rectification	Request correction of any inaccurate, incomplete or outdated personal information.
Right to Erasure	Request deletion of your personal information where it is no longer necessary for the purposes for which it was collected, subject to our legal retention obligations.
Right to Restriction	Request that we restrict the processing of your personal information in certain circumstances, such as while a dispute is being resolved.
Right to Data Portability	Receive a copy of your personal information in a structured, commonly used, machine-readable format, and to transmit it to another controller.
Right to Object	Object to the processing of your personal information where it is based on legitimate interests, including for direct marketing purposes.
Right to Withdraw Consent	Where processing is based on consent, withdraw that consent at any time without affecting the lawfulness of processing before withdrawal.
Right to Lodge a Complaint	Lodge a complaint with the relevant supervisory authority in your jurisdiction if you believe your rights have been violated.

To exercise any of the above rights, submit a written request to support@vinaex.net. We may need to verify your identity before processing your request. We will respond within 30 days and will not charge a fee for reasonable requests.

11. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enable platform functionality, analyse usage, and deliver a more personalised experience. Our full Cookie Policy is available at vinaex.net/legal/cookies and describes in detail the types of cookies used, their purpose, duration and how to manage them.

Categories of cookies we use:

Item	Details
Essential	Required for core platform functionality, authentication and security. Cannot be disabled.
Analytics	Aggregated, anonymised data used to understand platform usage patterns and improve performance.
Preference	Remember your settings and customisations across sessions.
Security	Support fraud detection, anomaly monitoring and secure authentication flows.

You can manage cookie preferences through your browser or device settings. Blocking essential cookies will impair platform functionality.

12. Children's Privacy

The Vinaex platform is not directed at, and is not intended for use by, individuals under the age of 18 years. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected personal information from a minor, we will take immediate steps to delete such information from our records.

If you believe we may have collected information from a minor, please contact us immediately at support@vinaex.net.

13. Third-Party Links and Services

The platform may contain links to third-party websites, services or tools that are not operated or controlled by Vinaex. This Privacy Policy does not apply to third-party websites or services. We are not responsible for the privacy practices of such third parties and encourage you to review their privacy policies before providing any personal information.

14. Changes to This Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, technology, legal requirements or other factors. When material changes are made, we will:

- Update the "Last revised" date at the top of this document
- Notify registered users by email to the address associated with their account
- Display a prominent notice within the platform for a period following the change

Continued use of the platform following notification of material changes constitutes your acceptance of the revised Privacy Policy. If you do not agree to the updated terms, you must discontinue use and may request account deletion.

15. Governing Law

This Privacy Policy is governed by and construed in accordance with the laws of the Province of Ontario and the federal laws of Canada applicable therein, without regard to conflict of law principles. Any disputes arising from or relating to this Policy shall be subject to the exclusive jurisdiction of the courts of Ontario, Canada.

Users in the European Economic Area: To the extent EU data protection law applies, the provisions of this Policy relating to GDPR rights and obligations shall prevail over any conflicting provisions.

16. Contact Us

For any questions, requests or concerns regarding this Privacy Policy or our data practices, please contact our Privacy team:

Item	Details
Email	support@vinaex.net
Phone	+1 905-210-3928
Address	940 Winterton Way, Mississauga, ON L5V 2M2, Canada
Hours	Monday to Friday, 09:00 – 18:00 EST
Response	Within 30 days of receipt of a valid written request

If you are not satisfied with our response to your privacy request, you have the right to lodge a complaint with the Office of the Privacy Commissioner of Canada (OPC) at www.priv.gc.ca, or with the relevant data protection authority in your country of residence.

DOCUMENT CONTROL

Item	Details
Document title	Privacy Policy
Document owner	Vinaex Inc.
Approved by	_____
Approval date	_____
Next review	April 2027