Privacy Policy

FuryFortuna Ltd

FuryFortuna Ltd - Privacy and Data Protection Policy

Version 2.0 - Effective September 2026 - Supersedes all prior versions

1. Overview & Data Controller Framework

FuryFortuna Ltd ("FuryFortuna," "Company," "we," "us," or "our") is committed to protecting the privacy, confidentiality, and security of personal data collected from clients, website visitors, trading portal users, live stream broadcasters, and platform participants ("you," "your").

This Privacy & Data Protection Policy applies to all personal data collected or processed through:

- Our official website https://www.furyfortuna.com/;
- Our web-based trading portals, mobile applications, and secure client cabinets;
- Our FurySocial ecosystem, copy trading engines, and PAMM fund portals; and

- Our live streaming, video-on-demand (VOD), and community interactive surfaces.

Data Controller Designation: FuryFortuna Ltd, an International Business Company incorporated under the laws of Saint Lucia (IBC Registration No. 2026-00491), with its registered office at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia, acts as the Data Controller responsible for determining the purposes and means of processing your personal data.

For any privacy-related inquiries, data subject rights requests, or regulatory clarifications, please contact our Legal & Data Privacy Team at compliance@furyfortuna.com or support@furyfortuna.com.

2. Categories of Personal Data We Collect

We collect and process various categories of personal information necessary to deliver brokerage services, fulfil statutory AML/KYC obligations, and secure our platforms:

2.1 Information Provided Directly

- Identity & Demographic Data: Full legal name, date of birth, place of birth, gender, nationality, and country of residence.
- Contact Details: Residential address, mailing address, email address, and telephone numbers.
- KYC & Verification Data: Government passport, national identity card, tax identification number (TIN), proof of

residence documents, source of wealth/funds declarations, tax residence status, and employment history.

- Financial Information: Bank account details, masked credit/debit card numbers, cryptocurrency wallet addresses, net worth, annual income range, and trading experience profiles.

> IMPORTANT ACCOUNT SECURITY NOTICE
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> Account login passwords and authentication credentials are encrypted and stored securely. FuryFortuna staff will NEVER ask you to disclose your account password via telephone, live chat, or email. You are solely responsible for keeping your login credentials confidential.

2.2 Automatically Collected & Technical Data

- Trading & Transactional Logs: Trading order executions, open positions, account balances, deposits, withdrawals, commission fees, rollover credits, and account history.
- Technical & Usage Telemetry: IP address, device fingerprints, operating system, browser type and version, referring URLs, access timestamps, location metrics, and session activity.
- Communications & Support Logs: Customer support phone call recordings, live chat transcripts, email correspondence, and formal dispute records.

2.3 Supplemental Data - Live Streaming & FurySocial Services

- Broadcaster Audio/Video Feeds: Camera, microphone, and screen-sharing video feeds transmitted during live broadcasts.
- FurySocial Profile Data: Display names, profile avatars, strategy descriptions, stream titles, categories, thumbnails, and tags.
- Recordings & Replays: Full video recordings, replays, and video-on-demand (VOD) archives generated from live streams.
- Viewer & Community Interactions: Public chat messages, reactions, polls, tips, viewer session logs, watch time metrics, join/leave events, and moderation signals.

3. Lawful Bases & Purposes of Data Processing

FuryFortuna processes your personal data under the following legal bases:

3.1 Contractual Necessity

To evaluate account applications, verify identity, open and maintain trading accounts, execute trading orders, process deposits/withdrawals, calculate performance fees, provide customer support, and deliver requested live streaming or copy trading services. The provision of identity, contact, verification and financial information is mandatory for the opening and maintenance of an account. If this information is not provided or is incomplete, FuryFortuna cannot open or maintain the

account or provide its services. The provision of marketing preferences and other optional information is voluntary.

3.2 Compliance with Legal & Statutory Obligations

To comply with statutory mandates under the Saint Lucia Money Laundering (Prevention) Act, Proceeds of Crime Act, and Financial Action Task Force (FATF) standards. This includes conducting mandatory Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), PEP/Sanctions screening, transaction monitoring, and reporting suspicious activity to the Financial Intelligence Authority (FIA) of Saint Lucia.

3.3 Legitimate Business Interests

To prevent platform fraud, market manipulation, unauthorized access, and cyber security threats; to optimize platform stability, latency, and user experience; to moderate FurySocial community feeds; and to conduct internal risk audits and business analytics.

3.4 Explicit Consent

For direct marketing communications, optional educational updates, and non-essential analytical cookies (where explicit consent has been granted, which may be withdrawn at any time).

4. Disclosure & Sharing of Personal Data

FuryFortuna does not sell, rent, or trade your personal data to third parties for marketing or commercial purposes. We

disclose personal data only to trusted recipients on a strict need-to-know basis:

4.1 Affiliates & Third-Party Infrastructure Providers

- Identity Verification & Anti-Fraud Providers: Automated KYC/AML identity verification vendors (e.g., SumSub, ShuftiPro) and blockchain analytics platforms.
- Financial Institutions & Payment Processors: Banks, credit card acquiring institutions, Payment Service Providers (PSPs), and crypto payment gateways facilitating client funding operations.
- IT & Streaming Infrastructure: Secure cloud hosting centers, video ingest/transcoding/CDN infrastructure, CRM software platforms, and Web Application Firewalls (WAF).
- Professional Advisors & Auditors: External legal counsel, independent compliance auditors, tax advisors, and accounting firms.

4.2 Legal, Statutory & Regulatory Disclosures

We may disclose personal data where required by law, court order, subpoena, or statutory mandate to statutory regulatory bodies, the Financial Intelligence Authority (FIA) of Saint Lucia, judicial courts, or law enforcement authorities.

5. International Data Transfers & Technical Safeguards

As an international brokerage operating globally, personal data collected by FuryFortuna may be transferred, stored, and processed in servers situated outside your country of residence.

When transferring personal data internationally, FuryFortuna enforces strict technical, organizational, and contractual safeguards - including standard data protection clauses and enterprise encryption benchmarks - to guarantee data protection standards equivalent to Saint Lucia and GDPR benchmarks.

6. Data Security Controls & Operational Protection

FuryFortuna deploys multi-layered security controls to protect your personal information against unauthorized access, accidental loss, alteration, or destruction:

- Data Encryption: Transport Layer Security (TLS 1.3) for all web and API data in transit; Advanced Encryption Standard (AES-256) for data at rest.
- Access Restrictions: Strict Role-Based Access Controls (RBAC) ensuring only authorized compliance, legal, and operational staff can access personal records.
- Network Security: Next-generation firewalls, intrusion detection and prevention systems (IDS/IPS), continuous vulnerability monitoring, and DDoS mitigation.

7. Mandatory Statutory Data Retention Schedule

Pursuant to Saint Lucia statutory compliance regulations and international anti-money laundering (AML) laws, FuryFortuna retains client personal data, financial transaction logs, and KYC verification records for a minimum period of seven (7) years following:

- The formal closure, termination, or deactivation of the Client's trading account; OR
- The completion of the final financial transaction or legal proceeding.

Stream recordings, chat transcripts, moderation logs, and technical telemetry are retained for the duration required to meet regulatory compliance, dispute resolution, and safety obligations. Upon the expiration of mandatory retention periods, personal data is securely destroyed, erased, or permanently anonymized.

8. Cookies & Tracking Technologies

FuryFortuna utilizes cookies, web beacons, pixel tags, and local storage objects to maintain secure trading sessions, remember user preferences, and analyze platform traffic. Full details regarding cookie categories, session lifespans, third-party analytics (e.g., Google Analytics, Hotjar), and consent controls are set forth in our dedicated Cookie Policy.

9. External Links & Third-Party Web Properties

Our website and FurySocial portals may contain hyperlinks to third-party websites or external tools. FuryFortuna accepts no responsibility for the privacy practices, security controls, or content of external sites. We encourage users to review the privacy statements of all linked third-party properties.

10. Your Data Protection Rights & Choices

Subject to local statutory laws and mandatory AML retention rules, you hold the following data protection rights:

- Right of Access: Request confirmation of whether we process your personal data and receive a copy of your records.
- Right to Rectification: Request correction of inaccurate, outdated, or incomplete personal information.
- Right to Erasure (Right to be Forgotten): Request deletion of your personal data where processing is no longer necessary (subject to our mandatory 7-year statutory AML retention obligations).
- Right to Restrict Processing: Request temporary restriction of processing during formal accuracy or legal disputes.
- Right to Data Portability: Receive your personal data in a structured, commonly used, machine-readable format.
- Right to Withdraw Consent: Revoke consent for direct marketing communications or non-essential processing at any time.

To exercise any of your rights, please submit a formal written request to compliance@furyfortuna.com.

11. Supplemental Privacy Notice - EU / EEA Clients (GDPR)

This section applies specifically to residents of the European Union (EU) and European Economic Area (EEA), supplementing the main Privacy Policy pursuant to the General Data Protection Regulation (GDPR).

- Data Controller: FuryFortuna Ltd acts as the Data Controller under the GDPR.
- Lawful Basis: Personal data is processed based on contractual necessity, legal obligations, legitimate business interests, or explicit consent.
- GDPR Rights & Supervisory Complaints: EU/EEA clients may exercise their statutory rights to access, rectify, erase, restrict, or port data, withdraw consent, or lodge a formal complaint with a competent EU Data Protection Supervisory Authority.

12. Supplemental Privacy Notice - Live Streaming & FurySocial Data

This section applies to Broadcasters who transmit live audio, video, or screen feeds and viewers who interact across FurySocial streaming surfaces:

- Processed Audio/Video Feeds: Broadcasters explicitly consent to the real-time transmission, recording, and storage of camera, microphone, screen-share feeds, display names, and profile avatars.
- Public Nature of Streams: Live streams and replays are intended for the FuryFortuna audience and public web surfaces. Broadcasters and viewers must assume that all content, comments, and reactions displayed on stream are public.
- Stream Retention & Moderation: Stream recordings and chat transcripts may be retained for moderation, regulatory compliance, and dispute resolution purposes.

13. Policy Amendments & Revisions

FuryFortuna reserves the right to amend or update this Privacy Policy periodically to reflect changes in regulatory mandates, technology, or operational practices. Updated versions will be published on our website with a revised effective date. Continued use of our services following notice of changes constitutes acceptance of the updated policy.

14. Contact Information & Data Protection Office

For any inquiries, data subject requests, or regulatory privacy matters, please contact our Legal & Compliance Team:

- Company Name: FuryFortuna Ltd

- Legal Entity & Registration: International Business Company (IBC Registration No. 2026-00491), Saint Lucia
- Registered Physical Address: Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia
- Data Protection Officer Email: compliance@furyfortuna.com
- General Support Email: support@furyfortuna.com
- Official Website: https://www.furyfortuna.com/