

Privacy Policy of Virgilynex

This Privacy Policy (“Policy”) is designed to help you understand how Virgilynex (“we,” “our,” or “the Company”) collects, retains, uses, and shares your personal data when you access or use our website (www.virgilynex.com) and mobile applications. It also outlines your rights regarding your personal data and how we protect your privacy when you visit our platform or use our Services.

This Policy applies to the Virgilynex platform and its associated services. It operates in conjunction with any terms of business, contracts, or agreements we may have with you as a client or user of our services. This Policy, along with our Cookie Policy, applies to visitors who are neither clients nor users but access our platform and services.

Virgilynex is providing asset management, copytrading and trading services. The entity responsible for your personal data is Virgilynex, which determines the purposes and means of processing your data. The company is based in Costa Rica and is subject to applicable Costa Rican laws and regulations regarding personal data protection.

By using our services, you consent to the collection, retention, processing, and transfer of your personal information as described in this Policy.

I. Collection and Categories of Data

We collect personal information through various means depending on your relationship with us (e.g., client, user, applicant, or visitor). The categories of data we may collect include:

1. Direct Interaction with Client
2. Automated Interaction via Technology
3. Third-Party Sources (such as publicly available sources)

Potential Categories of Data Collected

- **Contact Data:** Full Name, Address, Username, Email Address, Telephone Number
- **Identification and Verification Data:** Full Name, Date of Birth, Nationality
- **Financial Data:** Transaction History, Source of Funds
- **Trading Data:** Transaction Information
- **Demographic Data:** Age, Income, Gender, Employment Status, Place of Residence

- **Communication Data:** Records of communications (phone, email, chat, etc.)
- **Technical Data:** IP Address, Unique Identifiers, Device Information, Geolocation Data
- **Cookies:** See our Cookie Policy

II. Use of Personal Information

Virgilnex processes personal data in compliance with applicable data protection laws and regulations. The personal data we collect is used for the following purposes:

- To provide, maintain, and improve our Services
- To verify identity and prevent fraud
- To comply with legal obligations (AML, KYC, tax reporting, etc.)
- To communicate with you regarding your account and Services
- For marketing and promotional purposes
- For analytical and business development purposes

Your data will be processed lawfully, fairly, and transparently, in accordance with applicable data protection laws. We implement processes to ensure the security of your personal data and ensure its accuracy.

III. Legal Basis for Processing Personal Data

We process your personal data based on the following legal grounds:

- **Performance of a Contract:** We process your data to fulfill our contractual obligations with you (e.g., providing copytrading, software and trading services).
- **Legal Obligation:** We process your data to comply with legal obligations (e.g., anti-money laundering and taxation laws).
- **Legitimate Interests:** We process data based on our legitimate interests in running the business, providing Services, and improving user experience.
- **Consent:** For certain activities (e.g., marketing), we may process your data based on your consent, which you can withdraw at any time.

IV. Purpose of Data Processing

The purposes for which we process your data and the categories of data involved include:

Purpose	Categories of Data	Legal Basis
Registration and Account Creation	Contact Data, Identification and Verification Data	Performance of a Contract
Providing Services	Contact Data, Financial Data, Trading Data	Performance of a Contract
Processing Transactions	Contact Data, Financial Data	Performance of a Contract
Compliance with Legal Obligations	Identification Data, Financial Data, Trading Data	Legal Obligation
Customer Communication	Contact Data, Communication Data	Performance of a Contract, Legitimate Interests
Marketing and Advertising	Contact Data, Technical Data	Consent, Legitimate Interests

V. Disclosure to Third Parties

We may share your personal data with trusted third-party service providers for the purposes outlined above. These may include:

- **Service Providers:** IT services, payment processors, customer support, identity verification, anti-fraud services.
- **Advertising Partners:** To deliver targeted ads and analyze user behavior.
- **Authorities:** To comply with legal requests or protect rights, safety, and property.

We ensure that any third parties who handle your personal data comply with relevant privacy and security standards.

VI. Data Retention

We retain your personal data for as long as it is necessary to fulfill the purposes for which it was collected. This includes complying with legal obligations, performing

audits, and maintaining records as required by law (e.g., anti-money laundering requirements).

For certain purposes, we may retain your data for up to **5 years** after the termination of the relationship with you, or for longer if required by law.

VII. International Data Transfers

We may transfer your personal data to countries outside of Costa Rica for processing. When this happens, we will ensure that appropriate safeguards are in place to protect your data in accordance with applicable laws.

VIII. Security Protection of Personal Information

We have implemented appropriate technical and organizational measures to protect your personal data from unauthorized access, loss, misuse, or disclosure. These include:

- Encryption technologies (SSL)
- Antivirus software
- Secure data storage
- Employee training on data privacy

However, please note that no system is 100% secure, and we cannot guarantee the security of data transferred over the internet.

IX. Your Rights

Under applicable data protection laws, you have the following rights regarding your personal data:

- **Right to Access:** You can request a copy of the personal data we hold about you.
- **Right to Rectification:** You can request the correction of inaccurate or incomplete data.
- **Right to Deletion:** You can request the deletion of your data in certain circumstances.

- **Right to Restrict Processing:** You can request restrictions on the processing of your data.
- **Right to Data Portability:** You can request that we transfer your personal data to another provider.
- **Right to Object to Processing:** You can object to the processing of your data based on legitimate interests.
- **Right to Withdraw Consent:** If we process your data based on consent, you can withdraw it at any time.

X. Children's Privacy

Virgilnex does not knowingly collect or process personal data from children under 18. If we learn that a child has provided personal data without parental consent, we will take steps to delete that information.

XI. Languages

This Policy may be available in multiple languages. In case of any discrepancies, the English version shall prevail.

XII. Contact Information

For any questions or concerns regarding this Privacy Policy or your personal data, please contact us at:

- **General Inquiries:** info@virgilnex.com
- **Support:** support@virgilnex.com
- **Data Protection / Compliance:** compliance@virgilnex.com

This Privacy Policy is subject to change and we recommend checking for updates periodically.

Last Updated: December 2025