

NEOMAAA

# Privacy Policy

The Anjouan Offshore Finance Authority of the Union of Comoros with an Investment Dealer license 15968, having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros.

Neomaaa.com | Support@neomaaa.com



# Privacy Policy

Version v.1.0 — 1 March 2026

## Neomaaa Ltd

Registered as International Business Company No. 15968

Licensed under International Brokerage License Number L15968/N

Licensed and authorized by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros  
Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros

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Neomaaa Ltd recognizes the vital importance of protecting your personal and financial information. This enables us to provide you with a secure website for your transactions. This privacy policy details how we manage the personal information provided to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s).

The Company applies data protection standards consistent with the principles of the General Data Protection Regulation (GDPR) and applicable data protection laws in jurisdictions where the Company's services are accessed, including but not limited to: Lei Geral de Proteção de Dados (LGPD, Brazil), Ley 1581 de 2012 (Colombia), Ley Federal de Protección de Datos Personales (Mexico), and equivalent legislation in Chile, Peru, and Argentina. Accordingly, the Company ensures that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Keep only as long as necessary for the purposes we have told you about.
- Kept securely.

We reserve the right to change and amend this privacy notice from time to time to take into consideration new technology, changes to our operations and practices and new laws and regulations. Our most current privacy policy will govern any personal information we hold on you.

## Data Controller

Neomaaa Ltd (trading as NEOMAAA), licensed and authorized by the Anjouan Offshore Finance Authority of the Union of Comoros with an Investment Dealer license 15968, having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros.

## Use of Personal Data and Lawful Basis for Processing

### 1.1 Identity Verification and Account Management

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As part of providing services, or information about our services, to you, we will need to verify your identity in order to set you up as a customer and we will need to use those details in order to effectively manage your account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out credit or identity checks on our behalf. We collect, process and disclose personal data to fulfill our contractual, regulatory and statutory obligations to our clients. It is in our legitimate business interest to do so and the use of your personal information in this way is necessary for us to deliver our contracted services to you. We also have an obligation to comply with applicable laws of the The Anjouan Offshore Finance Authority (AOFA), Law Enforcement Agencies, among others. For the avoidance of doubt, the lawful basis under which we process your personal data is for the fulfillment of our contractual obligations to you, our legitimate interest and to fulfill Neomaaa Ltd's legal or statutory obligation.

## **1.2 Provisions, Improvement and Development of Products and Services**

Upon account opening we will need to use your personal information to perform our services and comply with our obligations to you. It is in our legitimate interests to ensure that we provide you with the best products and services so we may regularly review your needs to ensure that you get the best possible products and services from us.

We may from time to time use personal information provided by you through your use of our services and/or through customer surveys to help us improve our products and services when you have opted to receive marketing materials from us, we will include instructions on how to opt out shall you wish to do so in the future.

## **1.3 Settlement of Enquiries and Disputes**

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim. It is in our legitimate interests to use your personal information in such a way.

## **1.4 Compliance with Applicable Laws and Regulations**

We may need to use your personal information to comply with applicable laws, court order or other judicial process, or the requirements of any applicable regulatory authority and share your personal information with third parties including but not limited to auditors and regulators. For instance, to conduct anti-money laundering and due diligence checks, to detect and prevent fraud, to monitor and record phone calls, to inform you of any changes in our services, to respond to complaints and enquiries, to maintain your records up to date. We do this to comply with our legal obligations and because it is in our legitimate interest to do so.

## **1.5 Profiling and Automated Decision-Making**

We may from time to time use personal information about you to form profiles about you so that we understand your needs and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which could affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way. You can object to an automated decision being made and ask us to verify the information obtained and or request another staff member to review it. Profiling means any form of automated processing of personal data

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consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, performance at work, economic situations, health, personal preferences, interests, reliability, behavior, location, movements etc.

## 1.6 Marketing

We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party. If a third party collected your name and contact details, they will only pass those details to us for marketing purposes if you have consented to them doing so. It is in our legitimate interest to use your personal information in such a way.

You always have the right to "opt out" of receiving our marketing. You can exercise the right at any time by contacting us. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you "opt-out" of our marketing materials, you will be added to our suppression list to ensure we do not accidentally send you further marketing.

We never share your name or contact details with third parties for marketing purposes unless we have your "opt-in" consent to share your details with a specific third party for them to send you marketing. We do use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. It is in our legitimate interest to use your personal information in such a way.

We retain your details on our marketing list until you "opt-out" at which point we add you to our suppression list. We keep that suppression list indefinitely to comply with our legal obligations to ensure we do not accidentally send you any more marketing.

## 1.7 Website Information

Our web pages and emails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

## 1.8 References and Surveys

From time to time, third parties, such as credit agencies may approach us to provide a credit reference about you for credit and identity checks. It may be in our legitimate interest to comply with our legal obligations or we may be obliged to provide such a reference in order to comply with a legal obligation.

From time to time, we may send you surveys as part of our customer feedback process and it is in our legitimate interest to ask for feedback to ensure that we provide the best service to you. However, we may from time to time also ask you to participate in other surveys and if you agree to participate in such surveys we rely on your consent to use the personal information we collect as part of such surveys. All responses to any survey we send out whether for customer feedback or otherwise will be aggregated and depersonalized before survey results are shared with any third parties.

## 1.9 Internal Business and Record Keeping

We may need to process your personal information for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal and regulatory obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us.

## 1.10 Our Premises

We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. If you have an accident at our premises, this may include an account of your accident. It is in our legitimate interest to do so.

We may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes.

It is not only a legal requirement but also in our legitimate interest to do so.

## 1.11 Sharing with Cooperation Partners and Suppliers

We may share your personal information with cooperation partners who provide services on our behalf or have introduced you to us or other cooperation partners or suppliers we have engaged with. It is in our legitimate interest to use your personal information in such a way to provide you with our services.

## 1.12 Sharing with Group Entities and Corporate Restructuring

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganization or group restructuring exercise, and for system maintenance support and hosting of data. It is in our legitimate interest to use your personal information in such a way.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business where necessary in connection with the purposes which your information was collected for. It is in our legitimate interest to do so.

## Collection of Personal Data

We may collect the following types of information from actual or potential customer:

- Name, address and contact details including but not limited to phone number and email address.
- Date of birth and gender.
- Professional and employment details.
- ID and/or passport number.
- National/tax identification number.
- Information about your income and wealth including details about your assets and liabilities, account balances, tax and financial statements.

- Trading history and performance.
- Social media or other network data when these technologies are used by you to communicate with Neomaaa Ltd.
- any other similar information.

We obtain this information through your use of our services or other dealings with us including through any of our websites, apps, the account opening applications, demo sign up, webinar sign up, subscribing to news updates and from information provided in the course of ongoing customer communication. We may collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources or through our 'refer a friend' scheme. When we do so, we ensure that any third party providing personal data to us has the required consent from the data subject to disclose the personal data to Neomaaa Ltd.

We may ask for other personal information voluntarily from time to time and if you choose not to provide the information we require to fulfill your request for a certain product or service, we may not be able to provide you with the requested product or service and it could mean that we need to terminate the service or account you have with us.

Please note that we keep records of your trading history including:

- products you trade and their performance.
- products we trade on your behalf and their performance.
- historical data about the trades and investments you made including the amount invested your preference for certain types of services and products.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice. We record calls in order to fulfill our regulatory obligation.

Please note that our offices or premises may have CCTV which will record your image.

## Your Consent

Where the use of your personal information by us requires your consent, such consent will be provided in accordance with the applicable customer terms and conditions available on our website(s) or any other contract we may have entered into with you or stipulated in our communication with you from time to time.

Where we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw your consent at any time by contacting us using the contact details set out below.

## Disclosure of Personal Data

We may, in the standard operation of our business, share selected information to the following:

- credit providers, any relevant governmental, or law enforcement authority as required by law or as agreed with you.
- our insurers, agents, service providers, specialist advisers, suppliers and subcontractors who provide us with insurance, administrative, IT, financial, verification, regulatory, compliance research or other services.
- professional advisors such as our solicitors in connection with any ongoing or prospective legal proceedings or in order to establish, exercise or defend our legal rights, and our auditors and accountants in order to satisfy our regulatory and financial reporting obligations.
- introducing brokers and affiliates with whom we have a mutual relationship;
- credit reporting and reference agencies.
- any member of our group, meaning our subsidiaries, our ultimate holding company and its subsidiaries, and successors in title to our business anyone authorized by you.

Generally, we require that third parties who handle or obtain your personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy notice. Where any third party uses your personal data as data controller, such use is not covered by this privacy notice and is not subject to Neomaaa Ltd's privacy standard and procedures. Please note that third parties such as credit reporting and reference agencies may keep a record of any searches and may use the search details to assist other companies in performing their searches.

## Security and Storage of Personal Information

Neomaaa Ltd takes the safeguarding of your data very seriously. Neomaaa Ltd Markets has taken measures and precautions to protect the security of your personal information. Our employees understand to respect the confidentiality of your personal information. We have a Security Officer to ensure our compliance with this privacy policy and applicable laws and regulations. We hold personal information in secure computer storage facilities, paper-based files, and/or other records. When we consider that personal information is no longer needed, we will remove any details that will identify you and we will securely destroy the records.

Please note that we are subject to certain laws and regulations which require us to retain a copy of the documents we used to comply with our customer due diligence obligations, and supporting evidence and records of transactions with you and your relationship with us for a minimum period of five (5) years after our relationship with you has terminated.

Personal information held in the form of a deed is subject to a storage period of twelve (12) years after our relationship with you has terminated.

If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be five (5) or ten (10) years after our relationship with you has terminated.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

## Cookies

A cookie is a small piece of text stored on your computer or device when you visit a website or an app. We use cookies on our websites and apps to provide you with more relevant and effective experience. For further information about cookies please refer to our website.

## Technology Improvements

We want to provide you with better and improved experience through constant technology development. This may result in a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy notice at the time of change.

## Links to Third Party Websites

Our websites or apps may have links to external third party websites.

Please note that third party websites are not covered by this privacy notice and those websites are not subject to Neomaaa Ltd's privacy standards and procedures. Please check with each third party regarding their privacy standards and procedures.

## Your Rights

Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office ("ICO").

Under certain circumstances, by law you have the right to:

- Be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights.

Therefore we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.

- Request access to your personal information (commonly known as a "data subject access request").

This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information.

This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- Withdraw consent. In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- Lodge a complaint. If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please contact us via our compliance team as per details below.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

## **Complaint and Contact**

If you are concerned about us ensuring your privacy, you can make a complaint. We will act upon it promptly. You can contact us via our compliance team as set out below.

If you are not satisfied with our response to your complaint, you have the right to file a complaint with the Information Commissioner's Office ("ICO").

If you have any questions regarding our privacy policy, please email: [support@neomaaa.com](mailto:support@neomaaa.com)

## **Data Retention Schedule**

The Company retains personal data in accordance with the following schedule:

- KYC/AML documentation: minimum 5 years after termination of the business relationship;
- Trading records and transaction history: minimum 5 years after termination;
- Communication records (phone, email, chat): minimum 5 years after termination;
- Documents in the form of a deed: 12 years after termination;
- Marketing suppression lists: indefinitely to ensure compliance;
- CCTV recordings: maximum 90 days unless required for legal proceedings.

## International Data Transfers

The Company may transfer your personal data to countries outside your country of residence for the purposes described in this Privacy Policy. Such countries may not provide the same level of data protection as your home country. By using the Company's services, you consent to such transfers.

Where personal data is transferred internationally, the Company takes reasonable steps to ensure that adequate safeguards are in place, including contractual obligations on the recipient to protect personal data to a standard consistent with this Privacy Policy.

## Data Breach Notification

In the event of a data breach that poses a risk to your rights and freedoms, the Company will notify the relevant regulatory authority without undue delay and, where feasible, within 72 hours of becoming aware of the breach. Where the breach is likely to result in a high risk to your rights and freedoms, the Company will also notify you directly.

## Third-Party Payment Processors

The Company uses third-party payment service providers (PSPs) to process deposits and withdrawals. These PSPs may collect and process your personal and financial data in accordance with their own privacy policies. The Company is not responsible for the privacy practices of third-party PSPs.

By making a deposit or withdrawal through the Company's platform, you consent to the sharing of your personal and financial data with the relevant PSP for the purpose of processing your transaction.

## Trading Data and Analytics

The Company collects and processes trading data, including but not limited to: order history, execution data, trading patterns, platform usage, device information, IP addresses, and geographic location data. This data is used for:

- Providing and improving the Company's services;
- Risk management and fraud detection;
- Monitoring compliance with the Client Agreement, Terms & Conditions, and Trading Restrictions & Anti-Fraud Policy;
- Regulatory reporting and compliance;
- Internal analytics and business intelligence.

The Client consents to such collection and processing as a condition of using the Company's services.

## **Anti-Fraud and Abuse Processing**

The Company reserves the right to monitor, analyze, and process trading behavior, platform usage, device fingerprints, network characteristics, and execution patterns for the purposes of detecting fraud, abuse, manipulation, arbitrage, latency exploitation, or any activity that may harm the integrity of the trading environment or the Company's operations.

The Company may use automated systems, algorithms, and manual review to identify suspicious, abusive, or irregular activity. Where such activity is identified, the Company may take immediate action including account suspension, trade cancellation, profit reversal, or account termination without prior notice.

The lawful basis for this processing is the Company's legitimate interest in protecting its business, infrastructure, and other clients, as well as compliance with applicable anti-money laundering and anti-fraud regulations.

## **Device Fingerprinting and Identification**

The Company may collect and process device fingerprinting information, including but not limited to: browser type and version, operating system, screen resolution, installed plugins, hardware identifiers, IP address, geolocation data, and behavioral signals (such as typing patterns and mouse movements) to uniquely identify users, prevent fraud, detect multi-account abuse, and ensure platform security.

This data may be used to link accounts operated by the same individual under different identities and to detect the use of VPNs, proxy servers, or other tools designed to mask geographic location or identity.

## **Automated Risk Control and Decision-Making**

The Company may use automated decision-making systems, including algorithmic risk control, to monitor and manage Client accounts. Automated systems may trigger account restrictions, trading condition modifications, order rejections, account suspensions, or account closures based on predefined risk models, behavioral analysis, and real-time trading data.

The Client acknowledges that automated decisions may be made without human review and may affect the Client's ability to trade, deposit, or withdraw funds. The Client has the right to request a manual review of any automated decision by contacting the Company's compliance team.

The lawful basis for automated decision-making is the Company's legitimate interest in risk management and the performance of the contractual relationship with the Client.

## **Affiliate and Introducing Broker Data Sharing**

The Company may share personal data, trading data, and account information with introducing brokers (IBs), affiliates, and partners for operational, compliance, commission calculation, and risk management purposes. This includes but is not limited to: Client name, account number, trading volume, deposit and withdrawal history, and account status.

Introducing brokers and affiliates are required to treat shared data confidentially and in accordance with applicable data protection laws. The Company is not responsible for the data processing practices of third-party introducing brokers or affiliates.

## Server Logs and Platform Records

The Company collects and stores server logs, trading platform logs, API access logs, and system access records. These records include but are not limited to: login times, IP addresses, actions performed, orders submitted, trades executed, system errors, and platform interactions.

Server logs and platform records are retained for a minimum of five (5) years and may be used for security monitoring, compliance auditing, dispute resolution, and legal proceedings. Server log data has absolute priority as evidence in any dispute between the Client and the Company.

## Artificial Intelligence and Algorithmic Processing

The Company may use artificial intelligence (AI), automated analytical tools and systems to process personal and trading data for the following purposes:

- Fraud detection and prevention;
- Risk management and exposure monitoring;
- Trading behavior analysis and abuse detection;
- Client profiling and appropriateness assessment;
- Compliance monitoring and regulatory reporting;
- Service improvement and platform optimization.

The Client consents to such processing as a condition of using the Company's services. The Company does not disclose the specific algorithms, models, or methodologies used for AI-based processing.

## Consent to Trading Behavior Monitoring

By opening an account and using the Company's services, the Client explicitly and irrevocably consents to the continuous monitoring, recording, analysis, and processing of all trading activity, behavior patterns, platform usage, execution data, and related metadata.

This consent covers monitoring conducted through automated systems, manual review, and any combination thereof. The Client acknowledges that such monitoring is essential for the Company's risk management, fraud prevention, and regulatory compliance obligations.

## Use of Data for Legal Defense and Proceedings

The Company may use any and all collected personal data, trading data, communication records, server logs, and platform records as evidence in legal proceedings, dispute resolution, arbitration, regulatory investigations, or any other proceeding where the Company considers such data relevant to the defense or prosecution of a claim.

The Company may disclose such data to courts, arbitrators, regulatory authorities, law enforcement agencies, and the Company's legal advisors without further consent from the Client where the Company considers such disclosure necessary for the protection of its legal interests.

Data retained for legal defense purposes may be held beyond the standard retention periods specified in this Privacy Policy where a legal claim or regulatory investigation is ongoing or reasonably anticipated.

## **No Expectation of Privacy in Trading Environment**

The Client acknowledges and agrees that there is no expectation of privacy when using the Company's trading platform, systems, servers, APIs, or infrastructure. All actions, communications, orders, trades, and interactions with the platform may be monitored, recorded, analyzed, and stored by the Company at any time and without notice. The Client waives any claim based on an alleged violation of privacy arising from such monitoring.

## **Cross-Entity Account Correlation**

The Company reserves the right to correlate, link, and cross-reference Client accounts across related entities, platforms, brands, or services operated directly or indirectly by the Company, its group entities, or its partners. This includes matching accounts based on personal data, device fingerprints, IP addresses, behavioral patterns, payment methods, or any other identifying information.

Account correlation may be used to detect multi-account abuse, bonus fraud, affiliate manipulation, coordinated trading, and other prohibited activities. The Company may take action against any or all linked accounts based on activity detected on any single account.

## **Evidence Priority**

Server logs, platform records, execution logs, system access records, and internal monitoring records maintained by the Company shall constitute conclusive, final, and binding evidence in any dispute, complaint, claim, arbitration, or legal proceeding between the Client and the Company. The Client agrees not to challenge the admissibility, accuracy, or completeness of such records.

In the event of any discrepancy between the Client's records and the Company's records, the Company's records shall prevail.

## **Risk Profiling and Client Categorization**

The Company may assign risk scores, behavioral classifications, trading profiles, and internal client categories to each Client account based on trading activity, deposit patterns, withdrawal behavior, device usage, geographic data, and any other relevant factors.

Such classifications are used for internal risk management, execution routing, trading condition customization, and compliance purposes. The Company is not obligated to disclose risk scores, behavioral classifications, or internal categories to the Client.

## **Data Sharing with Liquidity and Technology Providers**

The Company may share anonymized, pseudonymized, or identifiable Client data with external liquidity providers, execution partners, technology providers, data analytics firms, and other third parties involved in the provision of the Company's services. Such sharing is necessary for order execution, risk management, pricing, and platform operation.

By using the Company's services, the Client consents to such data sharing. The Company takes reasonable steps to ensure that recipients treat shared data confidentially.

## **Retroactive Review of Trading Activity**

The Company reserves the right to review historical trading activity at any time, including after account closure or fund withdrawal, and to take action retroactively based on such review. Retroactive actions may include trade cancellation, profit reversal, balance adjustment, account reopening for investigation purposes, and recovery of funds.

There is no limitation period on the Company's right to conduct retroactive review, except as required by applicable law.

## **Behavioral Analytics and Predictive Modeling**

The Company may use predictive analytics, behavioral modeling, statistical risk models, pattern recognition, and automated analytical systems algorithms to analyze Client data and predict future behavior, risk exposure, and potential abuse. The results of such analysis may be used to modify trading conditions, restrict account functionality, or terminate the Client relationship.

The Company is not obligated to disclose the specific models, algorithms, or criteria used in predictive analytics or behavioral modeling.

## **Survival of Data Rights After Account Closure**

All data collection rights, monitoring rights, processing rights, storage rights, evidence priority rights, and legal protections established by this Privacy Policy shall survive the termination or closure of the Client's account indefinitely. The Company shall retain the right to process, store, and use Client data after account closure for compliance, legal defense, regulatory reporting, fraud prevention, and any other purpose described in this Privacy Policy.

The Client's obligations of consent to monitoring and data processing, as established by this Privacy Policy, are irrevocable and survive account termination.

## Contact Information

If you have any questions regarding this Privacy Policy, please contact:

Email: support@neomaaa.com Compliance Team: compliance@neomaaa.com Address: Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros Neomaaa Ltd Trading as NEOMAAA International Business Company No. 15968 International Brokerage License Number L15968/N \*© 2025--2026 Neomaaa Ltd. All rights reserved.\*

## Contact Information

Company: Neomaaa Ltd Email: support@neomaaa.com Compliance: compliance@neomaaa.com Website: neomaaa.com Address: Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros Licensed and authorized by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros.

# Acknowledgement

By using the Company's services, the Client acknowledges having read, understood and accepted the Privacy Policy.

## **Neomaaa Ltd**

Trading as NEOMAAA

International Business Company No. 15968

Regulated by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros

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## Contact Information

### **Company: Neomaaa Ltd**

Email: [support@neomaaa.com](mailto:support@neomaaa.com)

Website: [neomaaa.com](https://neomaaa.com)

Address: Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros