

Privacy Policy

Version 1.0 – Last updated: March 2022

Our Commitment to You

Thank you for showing interest in our service. In order for us to provide you with our service we are required to collect and process certain personal data about you and your activity.

By entrusting us with your personal data, we would like to assure you of our commitment to keep such information private and to operate in accordance with all regulatory laws and all EU data protection laws, including [General Data Protection Regulation \(GDPR\) 679/2016 \(EU\)](#).

We have taken measurable steps to protect the confidentiality, security and integrity of this data. We encourage you to review the following information carefully.

Grounds for data collection

Processing of your personal information (meaning, any data which may potentially allow your identification with reasonable means; hereinafter "Personal Information") is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

How do we receive information about you?

We receive your Personal Information from various sources:

1. When you voluntarily provide us your personal details in order to create a Live Trading Account (for example, your name and email address).
2. When you use or access our site and services, in connection with your use of our services (for example, your financial transactions).
3. From third party providers and services, such as credit reference agencies, fraud prevention agencies, identity verification vendors, banks, authentication service providers and public registers.

What type of information we collect?

In order to open an Inceptial account, and in order to provide you with our services we will need you to collect the following information:

Personal Information

We collect the following Personal Data about you:

- Registration data – your name, email address, phone number, occupation, country of residency, and your age (in order to verify you are over 18 years of age and eligible to participate in our service).
- Verification data – your personal documents with the personal data, including proof of identity and address, video or liveness check data, graphic images (images created by scanning, or photographic images), etc. and any other personal information required for Know-Your-Customer procedures according to the regulation.
- Voluntary data – when you communicate with us (for example when you send us an email or use a “contact

us” form on our site) we collect the personal data you provided us with.

- Financial data – by its nature, your use of our services includes financial transactions, thus requiring us to obtain your financial details, which includes, but not limited to your payment details (such as bank account details and financial transactions performed through our services).
- Technical data – we collect certain technical data that is automatically recorded when you use our services, such as your IP address, MAC address, device approximate location.

Non-Personal Information

We record and collect data from or about your device (for example your computer or your mobile device) when you access our services and visit our site. This includes, but not limited to: your login credentials, UDID, Google advertising ID, IDFA, cookie identifiers, and may include other identifiers such your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us.

If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

Tracking Technologies

When you visit or access our services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies ("Tracking Technologies"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our services, improve our site's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information.

To learn more about our Tracking Technologies please visit our Cookie Page.

How do we use the information we collect?

- Provision of service - we will use your Personal Data you provide us for the provision and improvement of our services to you.
- Marketing purposes - we will use your Personal Data (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Data, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the “unsubscribe” link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications or reply to your queries and feedback you provide us.
- Opt-out of receiving marketing materials - If you do not want us to use or share your personal data for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your personal information with third parties for non-marketing.

- purposes (for example to fulfill your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your personal data are authorized to use your Personal Data only as necessary to provide these nonmarketing services.
- Analytics, surveys and research - we are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyze the information we have to develop, evaluate and improve these features.
- Protecting our interests - we use your Personal Data when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of Growth Capital LLC, its users and/or partners.
- Enforcing of policies - we use your Personal Data in order to enforce our policies, including but limited to our Terms, or Client Agreement.
- Compliance with legal and regulatory requirements - we also use your Personal Data in order to perform our regulatory requirements such as client identification or due diligence as stated in the Law of The Republic of Belarus dated June 30, 2014 No. 165-Z "ON ACTIONS TO PREVENT LEGITIMIZATION OF PROCEEDS OF CRIME AND FINANCING OF TERRORISM AND FINANCING WEAPONS OF MASS DESTRUCTION PROLIFERATION" and other requirements of the legislation of the Republic of Belarus.

With whom do we share your personal information?

- Internal concerned parties - we share your data with companies in our group (outside the Republic of Belarus), as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services.
- Financial providers and payment processors - we share your financial data about you for purposes of accepting deposits or performing risk analysis.
- Business partners - we share your data with business partners, such as storage providers and analytics providers who help us provide you with our service.
- Legal and regulatory entities - we may disclose any data in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement, take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of Growth Capital LLC, its users and/or partners. We may also disclose your personal data were requested by our supervisor (the National Bank of Belarus), or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker.

How we protect your information

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. We use ‘Secure Socket Layer (SSL)’ as well as ‘Transport Layer Security (TLS)’ encryption technologies in order to protect the information that is being submitted to us by you.

Your information is stored on secure servers and isn’t publicly available. We limit access of your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us. You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Information, we cannot ensure or warrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

Cookie Disclosure

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. NBHM use cookies to personalise content and ads, to provide social media features and to analyse our traffic. NBHM also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you’ve provided to them or that they’ve collected from your use of their services.

The table below explains the cookies we use and why.

Name	Expiry	Purpose description
_ga	2 years	Used by Google Universal Analytics to distinguish unique users by assigning a randomly generated number as a client identifier.
_gat	1 day	Used by Google Universal Analytics to throttle request rate.
_gid	1 day	Used by Google Universal Analytics to store and update a unique value for each page visited.
_pk_id	1 year	Used by Matomo Analytics Platform to help us track visitor behaviour and measure site performance.
_pk_ses	1 day	Used by Matomo Analytics Platform to track page requests from the visitor during the session.
_fbp	3 months	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.
freshworkss360-vid	1 year	Website Live Chat Software by Freshworks

CP-SessionID	1 day	These cookies keep track of non-personally identifiable information about users of the my.nbhm.eu site, including: browser used to access the site, date and time, the URL of the page being loaded, users who have visited a particular website(s), any previously assigned cookie identification (a unique identifier assigned to a user to identify repeat visitors), browser window size, the geographic location of the user, device and operating system used to access the Site.
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Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit allaboutcookies.org Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

To opt out of being tracked by Google Analytics across all websites:

[Google Analytics Opt-out Browser Add-on](#)

Visit [Off-Facebook Activity](#) tool page to Manage Your Off-Facebook Activity or Clear History. That page can tell you which companies are supplying Facebook with information about your real-world activity.

Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.

HOW TO CONTACT US?

If you decide to terminate your account, you may do so by emailing us at <https://inceptial.com/>. If you Terminate your account, please be aware that personal information that you have provided us may still be maintained for legal and regulatory reasons (as described above), but it will no longer be accessible via your account.

Updates to this Policy

This Privacy Policy is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.

