

TOP  Markets

# Privacy Policy

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**Summary:** We are TOP 1 MARKETS PTY LTD (“TOP1 Markets” or “we”). We are committed to respecting your privacy and safeguarding the confidentiality of the information you provide to us. We will only share your personal data with third parties where it is necessary to provide the services and information you have requested, as detailed in this Privacy Policy.

## 1. About Us

TOP1 Markets acts as the data controller responsible for your personal data and is the sole proprietor of the website top1markets.com (the "Website"), the TOP1 Markets mobile application, and the services provided by TOP1 Markets (collectively referred to as the "Services"). TOP1 Markets collects information from users through various means as outlined in this Privacy Policy.

This Privacy Policy governs the personal data that we collect from you when you visit our Website, use our mobile application, create an account, or engage with our Services (collectively referred to as “you” or “your” as applicable). This document details the categories of personal data we collect, the purposes for which we collect it, the legal basis for processing your personal data, the methods of storage, and the circumstances under which we may share your personal data with third parties.

For the purposes of this Privacy Policy, "personal data" refers to any information relating to an identified or identifiable individual.

By accessing our Website or mobile application and submitting your personal data, you are consenting to the terms set forth in this Privacy Policy. We strongly recommend that you read this document carefully.

## 2. Policy Updates

We reserve the right to modify this Privacy Policy at any time by posting an updated version on our Website and mobile application. You are encouraged to periodically review our Website to ensure that you are aware of any changes that may be made. Where required by applicable law, we will notify you of any significant changes to this Privacy Policy.

This version of the Privacy Policy is effective as of August 20, 2024 (V.4.2.2).

### 3. Personal Data We Collect

We are committed to adhering to the principle of data minimization, collecting only the personal data necessary to provide our services. Each instance of data collection will clearly state the purpose of the collection, and ensure that its use is strictly aligned with those purposes.

#### 3.1 User Account

If you choose to create an account, you will be required to provide us with certain personal data in order for us to grant you access to additional services that benefit users. You may also choose to provide us with additional information about yourself as described below.

During registration, you will be asked to provide us with any of the following:

- Your email address or phone number;
- Your account information from one of the following social internet services: Facebook, Google, Apple, Line (available only in certain countries/regions), Zalo (available only in certain countries/regions);

#### 3.2 Identity Verification

The collected information will be used to perform Know Your Customer (KYC) procedures, identity verification, and to ensure compliance with anti-money laundering regulations and other legal requirements.

- Government-issued identification (e.g., details from national ID card, passport, driver's license, health insurance card);
- Personal identity data (e.g., first and last name, gender, date of birth, nationality);
- Contact information (e.g., email address, phone number);

Please note that the above information will not be publicly displayed and will be protected in strict accordance with our Privacy Policy.

#### 3.3 User Profile

You may add more information about yourself in the profile settings, which may be displayed in

chat rooms and live streaming sessions; however, this is not mandatory.

- Username;
- User avatar image;
- Personal introduction;

Please note that the above information will be publicly displayed and may be used in accordance with the scope of this Privacy Policy.

### 3.4 Payment/Withdrawal Information

The information you provide is primarily used to process payments and withdrawals, monitor fund transactions, and is processed by our payment processors. Additionally, we will use this information to communicate with you regarding your orders and services. Rest assured, we do not have access to the payment card information you provide during payments, nor will we share your personal information with any other party. If any issues arise while processing your order, we will contact you directly.

- Bank account details and photos (e.g., bank name, bank account number, etc.);
- USDT wallet address (e.g., TRC20 network wallet address for USDT);
- Live trading account ID (e.g., trading account ID);

Rest assured, unless explicitly stated in this policy (Section 5.3, Third-Party Payment Processors), we will not share the above information with any other party, and it will be strictly protected in accordance with our Privacy Policy.

### 3.5 Contact Data

We may also process any personal data you choose to provide to us through phone, email, or by accessing our Website or mobile application or any other sites we operate.

By providing your phone number, you consent to receive SMS messages from us. Message and data rates may apply. Message frequency varies. Unless explicitly stated in this policy, we will not share your phone number or email address with any other party.

### 3.6 Cookies and Other Technologies

We use browser cookies (small text files placed on your device) to manage our Website, collect and analyze statistical information, ensure security, combat spam, and for advertising purposes. Cookies allow us to provide a better user experience as you browse our Website and help improve its functionality. For more detailed information on the use of cookies, please refer to our Cookie Policy.

We also use web beacons (small graphics with unique identifiers) for analysis and advertising, and to further develop, test, and improve our Services, as described in our Cookie Policy.

### 3.7 Log Files

Like most websites, we use web server log files. The records in our log files include Internet Protocol (IP) addresses (for more details, please refer to Section 3.8, “Device Information,” and Section 5.5, “Third-Party Service Providers”), browser type, Internet Service Provider (ISP), referring pages, exit pages, platform type, and date/time stamps. We use web server log files to manage the site, provide broad traffic information for site planning purposes, and ensure compliance with our Terms of Service. Please note that IP addresses are not linked to any personal data contained in our web server log files.

### 3.8 Device Information

We collect the following information about the device you use to interact with our services: the device’s IP address (from which we may infer your country/region of connection), device type, operating system, and the version of the application and browser. We collect this information to prevent spam and abuse of our services. In certain jurisdictions, an IP address may be considered personal data, and it will be processed in accordance with this Privacy Policy.

### 3.9 Analytics

When you use our Website and mobile application, we may automatically collect analytical information, including user behavior. This information may include your general device information, device identifiers (e.g., Google Advertising ID for Android devices; IDFA for iOS devices), network information, and interaction events with the Website and mobile application. Additionally, we track and record user behavior data within the application, such as page views,

click flows, and user preference settings, for behavioral analysis and user experience optimization.

We collect only anonymized data, and this analytical information does not include any personally identifiable information from your user profile. We use this information to analyze and improve the performance of our services and mobile application and to further develop, test, and enhance our services. For this purpose, we may use internal analytics as well as third-party service providers. For more detailed information about our use of third-party service providers, please refer to Section 5.5, “Third-Party Service Providers.” The collection and use of such data are intended to enhance our understanding of user behavior, thereby providing a more personalized and efficient service experience.

### **3.10 International Data Transfers**

To ensure the global availability of our services, your personal data may need to be transferred across borders and processed in different countries. Regardless of where your data is transferred, we strictly comply with the data protection laws and regulations of the relevant countries or regions. We take all necessary measures, including the use of encryption technology and the execution of data protection agreements, to ensure the security and confidentiality of your personal data.

### **3.11 Data Received from Third Parties**

When you log in to your account using internet service credentials (Facebook, Google, Apple, Line, Zalo), these services will send us your username and the email address associated with the credentials you used. We do not control or assume any responsibility for the way third parties provide information about you and/or process your personal data.

### **3.12 Facebook permissions asked by this Application**

This Application may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).

The permissions asked are the following:

➤ **Basic information**

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

➤ **Email**

Provides access to the User's primary email address.

➤ **The rights of Users**

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

(a) Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.

(b) Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.

(c) Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.

(d) Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.

(e) Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

(f) Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.

(g) Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

#### ➤ **Lodge a complaint**

Users have the right to bring a claim before their competent data protection authority.

#### ➤ **Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection. Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### ➤ **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one week.



## 4. How We Use Personal Data

We use your personal data in various ways to provide the services you have requested, to fulfill certain legitimate interests, and to comply with applicable laws, as described below.

If there are other legal bases for processing your personal data, we generally do not rely on your consent. If we do rely on your consent, we will inform you at the time.

Before engaging in marketing or other data processing activities not directly related to the provision of services, we will obtain your explicit consent. You may withdraw your consent at any time through our customer support channels.

### 4.1 Overview

A profile is a set of information about each user that details his/her viewing preferences and trading preferences. We do not use stored user settings for marketing purposes. Settings (such as chart settings, trading settings, etc.) are used solely to customize the user experience when using our Website and mobile application. We do not share your private settings with any third parties. Please note that when you create an account on the Website or mobile application, other users or visitors may access your public profile and see any information you have chosen to make public about yourself.

### 4.2 User Account and Profile Operations

- We use your contact information, such as email address or phone number, in the following ways:
  - To verify your account, ensure its security, and safeguard our services against spam, fraud, and abuse;
  - To acknowledge, confirm, and process your account;
  - To send all new users a welcome activation email or SMS to verify their email address and phone number;

### 4.3 Account Deletion

You may choose to discontinue using our Website and/or mobile application and request that we delete your account through the "Settings - Account Security - Delete Account" section. We

typically process account deletion requests within 30 business days, after which your account will be deleted. During this period, you can stop the deletion process at any time.

Please note that if you request the deletion of your account, we will delete the personal data you have subsequently provided to us. Some data, such as published community posts, chatroom messages, and live streaming discussions, will be retained as they have been integrated into our system. This data must be stored to maintain the integrity of the platform.

For lawful business processes and to comply with legal obligations, including tax law, auditing, and security, we are required to retain certain data for an extended period. This data includes, but is not limited to, transaction logs, financial records, and other detailed information. The retention period for each type of data will comply with specific legal requirements and may be up to 10 years.

Please note that once your account is deleted, search engines and third parties may retain copies of your publicly available information. It is also important to note that published posts/chat content will remain on the site.

#### **4.4 Marketing**

We may send you marketing emails about our products or services that are similar to the ones you have traded or services you have used, including information about events and other promotions that we believe may be of interest to you, unless you have instructed us that you do not wish to receive such information. We will only send you other promotional information via email if you have given us your consent, which you provide when you submit your personal data to us. You may opt out of receiving marketing information at any time by clicking the “unsubscribe” link in any of our emails.

#### **4.5 Social Notifications**

We notify you through the "Notifications" module in the mobile application: when new users follow you, when your posts/chat content receive likes, when users you follow publish new posts, and other similar activities.

#### **4.6 Service-Related Announcements**

In rare instances, it may be necessary to send service-related announcements. For example, if

our services are temporarily suspended for an extended period or if a major upgrade is released, we may send all users an email notification.

## 4.7 Customer Support

When you open a customer support chat window on our Website, we will use your contact information as well as information about your device, server logs, issue descriptions, and any other support materials (videos, screenshots, etc.) to assist in resolving your issues.

## 4.8 Legitimate Interests

We may process your personal data based on certain legitimate business interests, including the following:

- Where we are asked to respond to any inquiries, comments, or complaints you may have;
- To manage our Website and/or mobile application in order to better understand how visitors interact with the site and/or mobile application and to ensure that it is presented in the most effective manner for you and your device;
- To develop and improve our mobile application;
- For administrative purposes and as required in connection with our marketing efforts, we may share personal data among our affiliated companies, except in the cases where your consent is required as described above;
- To send you information about our products or services that are similar to the ones you have traded or used (unless you opted out or chose not to receive these emails when you provided your email address, or if you have subsequently indicated that you do not wish to receive such communications). Our legitimate interest is to ensure that our advertising content is relevant to you, and therefore we may process your data to send you information specifically tailored to your interests concerning our products or services;
- We may anonymize, aggregate, and de-identify the data we collect and use this anonymized, aggregated, and de-identified data for our own internal business purposes, including sharing it with our business partners, affiliated companies, agents, and other third parties for commercial, statistical, and market research purposes;
- For internal business/technical operations, including troubleshooting, data analysis, testing,

research, statistical, and survey purposes, as part of our efforts to maintain the security of our Website, networks, and information systems; and

- (a) To comply with legal obligations;
- (b) To respond to requests from competent authorities;
- (c) To enforce our Terms of Use or Website rules;
- (d) To protect our business or that of any affiliated businesses;
- (e) To protect our rights, safety, or property, and/or those of our affiliated companies, you, or others;
- (f) To enforce or defend legal rights or prevent harm. This means that if we determine that such disclosure is necessary to comply with the law, we may store and disclose your information to law enforcement, state or government agencies. This includes responding to court orders or subpoenas, and other judicial or regulatory processes.

The term “legitimate interests” as used in this Privacy Policy refers to the interests of TOP1 Markets and our affiliated companies in conducting and managing our business. When we process your personal data based on legitimate interests, we ensure that we consider and balance any potential impact on you and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We will not use your personal data for activities where our interests are overridden by the impact on users unless we have your explicit consent or are otherwise required or permitted by law. You have the right to object to the processing of your personal data based on our legitimate interests, for reasons related to your particular situation, at any time.

## 5. When We Share Personal Data

When we share data with third parties, we ensure that these third parties adhere to strict data protection standards, and the relevant data processing activities are thoroughly documented in contracts to ensure data security and compliance. We may share your personal data with third parties under the following circumstances:

## 5.1 Service Providers

Like many companies, TOP1 Markets sometimes partners with certain third parties who act on our behalf to support our operations, such as (i) payment processing services (see “Payment Information”), (ii) information technology providers and contractors (e.g., data hosting providers or delivery partners) to provide IT support and enable us to offer subscription services and other goods/services on our Website or to users, (iii) web and mobile analytics providers, (iv) digital advertising service providers, and (v) marketing and sales software solution providers. These affiliated parties may access, process, or store your personal data only for the purpose of performing the services we have contracted them to provide, in accordance with our instructions.

## 5.2 Payment Information

Users making payments must provide payment information (bank account details, USDT wallet address, live trading account ID, first and last name, etc.). This information is used solely for payment purposes and is processed by our payment processors. We do not have access to your payment card/bank account information during transactions. If any issues arise during order processing, your provided email/phone number will be used to contact you.

## 5.3 Third-Party Payment Processors

When you make payments through third-party payment processors, we provide your contact information (including bank account details, USDT wallet address, live trading account ID, first and last name, phone number, and email address) to them to facilitate the relevant transaction. This data is processed by the third-party payment processors to ensure the successful transfer of funds.

## 5.4 TOP1 Markets Affiliates

To provide you with the services you have requested, our affiliated companies may access and process the information we collect from you for the purposes outlined above, including providing you with products and services. Our affiliates will only use your data for the purposes for which it was originally collected.

## 5.5 Third-Party Service Providers

We may use third-party service providers to monitor and analyze our services and the use of the Website/mobile application to improve and enhance the quality of our services. Additionally, we may utilize other third-party service providers' technology and services to enhance the overall user experience on the Website/mobile application. These measures help us better understand user needs and continuously optimize our products and services.

### ➤ **Firebase SDK**

Firebase is a development platform provided by Google, used for collecting crash logs, behavioral statistics, and analyzing user behavior following a crash or after interacting with certain features.

(a) Types of Personal Data Involved:

Device system, device model, operating system, version number, device identifier

(b) For more detailed information on the types of data collected, please visit the [Firebase Privacy Policy](#).

### ➤ **Google Login SDK**

The Google Login SDK is used to support third-party login via Google accounts, simplifying the registration and login process.

(a) Types of Personal Information Collected:

Device identifier, device type, operating system, application version number, IP address, network information.

(b) For more detailed information on the types of information collected, please visit the [Google Privacy Policy](#).

### ➤ **GeeTest Behavior Verification SDK**

The GeeTest Behavior Verification SDK provides human-machine recognition services, enhancing the security of login, registration, and captcha retrieval processes.

(a) Types of Personal Information Collected:

Device system, IP address, device information, operating system.

(b) For more detailed information on the types of information collected, please visit the [GeeTest Behavior Verification Privacy Policy](#).

#### ➤ **GeeTest Device Verification SDK**

The GeeTest Device Verification SDK is used to provide registration and login protection and device risk assessment, ensuring the security of user accounts.

(a) Types of Personal Information Collected:

Device system, device model, device brand, screen size, IMEI, AndroidID, and location information, jailbreak status, emulator status, debugging identifiers.

Please note, the application does not obtain precise geographic location information. We only read the location information from device settings or SIM card, which does not represent the user's actual geographic location. According to default settings of the mobile system, this data collection does not require explicit user consent.

(b) For more detailed information on the types of information collected, please visit the [GeeTest Device Verification Privacy Policy](#).

#### ➤ **Adjust SDK**

Adjust provides attribution analysis for user sources, helping app developers optimize advertisement placements and marketing strategies.

(a) Types of Personal Information Collected:

Device system, device model, operating system, version number, unique identifier.

(b) For more detailed information on the types of information collected, please visit the [Adjust Privacy Policy](#).

#### ➤ **Twitter SDK (now known as X)**

The Twitter SDK (now known as X) supports users in sharing content on the Twitter (now X) platform, enhancing social interaction and content dissemination.

(a) Types of Personal Information Collected:

Device type, operating system, application version number, network information.

(b) For more detailed information on the types of information collected, please visit the [Twitter \(now X\) Privacy Policy](#).

#### ➤ Zalo SDK

The Zalo SDK supports the use of Zalo accounts for third-party login, simplifying the user login process.

(a) Types of Personal Information Collected:

Device type, operating system, application version number, network information.

(b) For more detailed information on the types of information collected, please visit the [Zalo Privacy Policy](#).

#### ➤ Line SDK

The Line SDK supports the use of Line accounts for third-party login, providing convenient login options.

(a) Types of Personal Information Collected:

Device type, operating system, application version number, network information.

(b) For more detailed information on the types of information collected, please visit the [Line Privacy Policy](#).

#### ➤ Facebook SDK

The Facebook SDK allows users to share and log in through Facebook, enhancing the app's social features.

(a) Types of Personal Information Collected:

Device type and model, device operating system details, hardware and software specifics, unique device identifiers, IP address, network information, location information.

Please note, the application does not obtain precise geographic location information. We only read the location information from device settings or SIM card, which does not represent the user's actual geographic location. According to default settings of the mobile system, this data collection does not require explicit user consent.



(b) For more detailed information on the types of information collected, please visit the [Facebook Privacy Policy](#).

➤ **Polyv Live Streaming SDK:**

Used to support live streaming features, allowing users to utilize related functionalities during live streaming.

(a) Types of Personal Information Collected:

SIM card IMSI identification code, device model, operating system and version, client version, device resolution, package name, unique device identifier, hardware and software characteristics, IP address.

(b) For more detailed information on the types of information collected, please visit the [Polyv Privacy Policy](#).

## 5.6 Business Transfers

In the event that our business is sold or assets are transferred, personal data pertaining to our general account users may be transferred as part of the assets. In such cases, customer personal information may be transferred to third parties, and we will ensure that such transfers comply with applicable privacy laws and are strictly managed according to our Privacy Policy.

## 5.7 Administrative and Legal Reasons

If we need to disclose your personal data:

- To comply with legal obligations and/or judicial or regulatory procedures, court orders, or other legal processes.
- To enforce our Terms of Use, website rules, or other applicable contractual terms you are subject to, or
- To protect ourselves or our contractors from loss or damage. This may include (but is not limited to) exchanging information with police, courts, or law enforcement agencies.

## 5.8 Advertising

We display advertisements on our website and/or mobile application and may use remarketing

and tracking features. Remarketing allows us to display targeted advertisements based on your activity on other websites, showing you ads that you might be interested in. Tracking features enable us to collect information about impressions, ad clicks, and certain actions completed by users through our website. This data also helps us evaluate the effectiveness of our advertising campaigns. Please note, we only collect anonymized data. We may use the following services for advertising, remarketing, and tracking purposes.

Please note, we do not share any personal information with our advertising clients. They can only access general statistical information, including the number of impressions and clicks generated by ads.

## **6. Public Information on Our Website and/or Mobile Application**

### **6.1 Public Personal Profiles**

When you create a personal profile on our services, other users or visitors can access your public personal profile and view any information you provide about yourself. This includes content you post (such as community posts), social information (such as followers and following lists, fans and fan lists, and number of likes), and contact information (such as your nickname, avatar, and personal bio). However, your email address, phone number, and saved posts will not be visible.

### **6.2 Public Content**

#### **➤ Community Posts**

Our mobile application allows users who have completed identity verification to use the posting feature to share their community posts with other users on the internet. You can also set your community posts to "Visible to Me Only." This means the content will not appear on your personal homepage or post list and will not be indexed by search engines. However, users with direct links to your content will be able to view it. Please note that you control who has access to the link.

#### **➤ Chat Room Content**

Our mobile application allows users who have completed identity verification to use our chat

feature to communicate trading-related content with other users in chat rooms. Please note that chat room content is fully public and visible to all participants in the chat room.

#### ➤ **Live Stream Discussion Content**

Our mobile application allows unregistered users to use the discussion feature in live streams to engage in discussions about live content with the live instructor or other users. Please note that discussion content in live streams is fully public and visible to all participants in the live stream.

#### ➤ **Photo Posting Feature**

To ensure the quality of community content and reduce the workload for community administrators, we restrict the photo posting feature to specific customers and strictly audit the content of uploaded photos. Please note, this feature is not available to all customers.

#### ➤ **Authorized Posting and Public Disclosure**

By using our posting feature, you grant us an irrevocable, perpetual, royalty-free license to publish and publicly disclose your content and username. This means your identity may be publicly recognizable. Additionally, when you comment on any content on our website, we will also publish related information such as the date and time of your comment.

#### ➤ **Content Review Policy**

When you use the posting feature to publish any content (including community posts, chat room conversations, and live stream discussions), we will store and process this content. Our community administrators will manually review all published content according to community content behavior guidelines, with the following specific procedures: (a) If content violates the behavior guidelines, administrators have the right to refuse its display. (b) For content that violates rules, administrators have the right to delete it directly without prior notice to users. After deletion, users will receive a related notification.

## **7. Community Content Behavior Guidelines**

## 7.1 Prohibited Behaviors

The following behaviors are strictly prohibited, and users violating these rules may be banned from using our services:

- Using abusive, vulgar language, profanity, or mild swear words in any form or context.
- Insulting or offending other users in any manner.
- Making statements that incite racial or ethnic hatred or discrimination, advocate any form of violence, and/or inflame other users' religious sentiments.
- Posting information and messages that violate any applicable laws.
- Posting duplicate information, similar graphic-text documents, unreasonable arguments (spamming), radical statements, personalized (inciting) messages, or irrelevant information (spam), discussing political news and events.
- Using abusive or vulgar words in user nicknames (explicitly or implicitly).
- Distributing malicious links, third-party online project links, and/or sponsorship links.
- Insulting and/or offending community moderators or chat developers.
- Discussing actions taken by community moderators. If you believe you have been treated unfairly, please contact our moderators.
- Posting contact details and social media account links, and sharing such information with other users without consent.
- Maliciously and/or otherwise soliciting any personal information and/or trading account details from other users.
- Sharing a user's personal data without their prior consent.

- Encouraging other users to violate the behavior guidelines.
- Promoting any services and/or products.
- Advertising or promoting any goods and/or services.
- Engaging in financial and/or other transactions within chat sessions.

## 7.2 Violation Handling Mechanism

In community management, if a moderator identifies a user's behavior as violating community rules, the moderator should notify the user of the specific violation before taking any banning action. If a user persistently violates the rules, such as posting offensive content, irrelevant links, or repeatedly violating guidelines, the moderator has the authority to permanently ban the user from using the posting function. Our platform is not responsible for any non-compliant advertisements or promotional activities. Additionally, if a user's behavior involves clear insults or repeated violations against others, the moderator has the right to ban without further notice.

## 8. Security of Personal Data

We utilize Transport Layer Security (TLS) encryption technology to protect certain information you submit to us. This technology prevents anyone from intercepting your information during transmission to TOP1 Markets. On secure pages, such as our order forms, a “lock” icon will appear in the browser window, confirming that a secure and encrypted connection has been established with the website. We strive to ensure that our website and mobile application are secure and comply with industry standards. We also use other protective measures such as firewalls and access control mechanisms to prevent unauthorized access to systems and data. If you choose to create an account, you are responsible for keeping your access details confidential and must not share these details with anyone else.

We also make every effort to protect users' offline information. All personal information of our users is restricted within the company. Only employees who need to access this information for work-related reasons are granted permission.

The servers that store personal data are located in secure facilities with restricted access.

We also require third-party service providers with whom we collaborate to comply with the same security standards to ensure the safe processing of data.

We continually strive to improve the ways we protect, store, and process all collected data, including enhancing physical security measures to help us address unauthorized system access. However, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee its absolute security.

## 9. Children and Sensitive Personal Data

Our website is not intended for children under the age of 18. We do not knowingly contact or collect personal information from children under 18 or sensitive personal data (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation). If you believe that we have inadvertently collected such information, please contact us immediately so that we can obtain special consent or delete the information.

## 10. Third-Party Websites

We may choose to include links to other websites (web links) on our website at our discretion. These websites may be operated by third parties with separate and independent proprietary policies. Therefore, we are not responsible for any content, activities, or privacy policies of these linked sites. We recommend that you read the privacy policy of each website you visit.

## 11. Application Permissions

We have outlined the various permissions required by our mobile application and their purposes. This practice is intended to enhance transparency and help you understand how we collect, use, and protect your personal information, ensuring you have full knowledge and control over your data.

## 11.1 Android Application Permissions

### ➤ **android.permission.INTERNET**

Allows the app to access the internet for data communication with the server.

### ➤ **android.permission.ACCESS\_NETWORK\_STATE**

Allows the app to access information about network connections to adjust its behavior based on network status.

### ➤ **android.permission.ACCESS\_WIFI\_STATE**

Allows the app to access information about Wi-Fi network status for monitoring and optimizing data transmission.

### ➤ **android.permission.CHANGE\_WIFI\_STATE**

Allows the app to change Wi-Fi status to ensure stable data communication with the server.

### ➤ **android.permission.CHANGE\_NETWORK\_STATE**

Allows the app to change network status to maintain continuous data communication with the server.

### ➤ **android.permission.WRITE\_EXTERNAL\_STORAGE**

These permissions are required for reading and writing to device storage. Uses include uploading profile pictures, posting images in the community, and uploading photos for KYC verification.

### ➤ **android.permission.READ\_EXTERNAL\_STORAGE**

These permissions are required for reading and writing to device storage. Uses include uploading profile pictures, posting images in the community, and uploading photos for KYC verification.

### ➤ **android.permission.CAMERA**

This permission allows the app to use the device's camera for various functions such as

uploading profile pictures, sending images in the community, scanning QR codes for posting, KYC verification uploads, and scanning QR codes to add a USDT wallet.

➤ **android.permission.READ\_MEDIA\_IMAGES**

These permissions are used to access media files on the device, for purposes similar to those listed above.

➤ **android.permission.READ\_MEDIA\_VISUAL\_USER\_SELECTED**

These permissions are used to access media files on the device, for purposes similar to those listed above.

➤ **android.permission.FLASHLIGHT**

Allows the app to control the device's flashlight, used when users take photos or scan QR codes.

➤ **android.permission.POST\_NOTIFICATIONS**

Allows the app to send or receive notifications, used to receive push messages.

➤ **android.permission.MOUNT\_UNMOUNT\_FILESYSTEMS**

Allows the app to mount or unmount file systems, used for saving images or files to local storage.

➤ **android.permission.WAKE\_LOCK**

Allows the app to prevent the device from going into sleep mode, ensuring that live broadcasts or other long-running applications are not interrupted.

➤ **android.permission.RECEIVE\_USER\_PRESENT**

Allows the app to receive notifications when the user unlocks the device, used to provide timely information updates.

➤ **android.permission.VIBRATE**

Allows the app to control device vibration, used for immediate feedback on successful transactions or important notifications.



➤ **android.permission.READ\_PHONE\_STATE**

Allows the app to access phone state, such as device ID and call status, commonly used for verifying device legitimacy or conducting device statistical analysis.

➤ **android.permission.FOREGROUND\_SERVICE**

Allows the app to run services in the foreground, ensuring that key services such as live broadcasts are not interrupted by background processing.

➤ **android.permission.BLUETOOTH**

Allows the app to use Bluetooth functionality, used to support related device connections and data transmission.

➤ **com.google.android.gms.permission.AD\_ID**

Allows the app to access the Google advertising ID, used for ad tracking and personalized ad display.

➤ **android.permission.RECORD\_AUDIO**

This permission is used to record audio, primarily for the real-time voice interaction feature in the live streaming SDK.

➤ **android.permission.MODIFY\_AUDIO\_SETTINGS**

Allows the app to modify audio settings, used to adjust volume during live broadcasts or video playback.

➤ **android.permission.SYSTEM\_ALERT\_WINDOW**

Allows the app to create overlay windows, enabling users to watch live broadcasts while using other apps.

➤ **android.permission.GET\_TASKS**

Allows the app to get information about currently or recently running tasks, used to maintain app performance and appropriate resource management.

➤ **android.permission.KILL\_BACKGROUND\_PROCESSES**

Allows the app to terminate background processes, used for quick recovery when the app encounters errors or performance issues.

➤ **android.permission.RECEIVE\_BOOT\_COMPLETED**

Allows the app to receive broadcast after the device has completed booting, used to automatically restore necessary background services or app settings.

➤ **com.google.android.c2dm.permission.RECEIVE**

Allows the app to receive push messages from Google Cloud Messaging, used for real-time information notifications.

➤ **com.google.android.finsky.permission.BIND\_GET\_INSTALL\_REFERRER\_SERVICE**

Allows the app to use Google services to receive installation referrer data, used for analyzing marketing effectiveness and app performance.

## 11.2 iOS Application Permissions

➤ **Network Access**

Allows the app to access the internet, ensuring effective data communication with the server.

➤ **System Notifications**

Allows the app to send and receive system notifications, used to receive push notifications from various services.

➤ **Advertising ID**

Allows the app to obtain the advertising ID, used for personalized advertising and analysis.

➤ **Using the Camera**

Allows the app to use the camera to take photos and videos, commonly used for user-uploaded avatars, community image sharing, document verification during KYC, and linking bank cards during deposits and withdrawals.

### ➤ Access to Photo Library

Allows the app to access photos and videos in the photo library, used for uploading avatars, community image sharing, document verification during KYC, and linking bank cards during deposits and withdrawals.

### ➤ Picture-in-Picture Mode

Allows the app to use picture-in-picture mode over other apps or activity interfaces, commonly used in live streaming apps, allowing users to continue watching live videos while using other apps.

## 12. Detailed Explanation of User Rights

We respect your personal data rights and are committed to supporting you in exercising the following rights:

### 12.1 Your Rights Include:

#### ➤ Right to Access:

You have the right to access personal data we hold about you.

#### ➤ Right to Rectification:

You have the right to request the correction of any inaccurate personal data.

#### ➤ Right to Erasure:

In certain circumstances, you have the right to request the deletion of your personal data.

#### ➤ Right to Data Portability:

You have the right to obtain your personal data in a structured, commonly used, and machine-readable format, and to have these data transmitted to a third party without hindrance.

### ➤ Right to Object and Restrict Processing:

In certain circumstances, you have the right to object to or request the restriction of processing your personal data.

## 12.2 Procedure for Exercising Rights:

- You can exercise your data rights by sending an email to [cs@top1markets.com](mailto:cs@top1markets.com) or by calling our customer service at +61 2 61720053. Additionally, you can submit your data request application through the “Inquiries and Feedback” feature of our mobile application.
- We commit to responding to your request within 30 days of receipt.
- If you are unsatisfied with our response, you have the right to lodge a complaint with a data protection authority.

## 13. Contact Information

If you have any questions or suggestions regarding the processing of personal data, please contact us using the following methods:

### 13.1 Telephone Number

+61 2 61720053

### 13.2 Email

[cs@top1markets.com](mailto:cs@top1markets.com)

TOP1 Markets Privacy Policy

# TOP1 Markets

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