



# Privacy Policy

Digital Trading Group of Central America S.A. DE C.V.

[www.solonix.one](http://www.solonix.one)

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## 1. PREAMBLE

Digital Trading Group of Central America S.A. DE C.V. (hereinafter referred to as "the Company", "we", "us", or "our") operates the digital asset trading platform accessible at [www.solonix.one](http://www.solonix.one) under the brand name Solonix.one. The Company is duly incorporated and operating in accordance with applicable law in El Salvador.

This Privacy Policy (the "Policy") sets out the manner in which the Company collects, processes, stores, and protects the personal data of individuals who visit our website, use our trading platform, or otherwise interact with our services (collectively, "Users" or "you").

This Policy is issued in compliance with applicable data protection legislation, including El Salvador's Personal Data Protection Law (Legislative Decree No. 144 of 2024) and any other applicable privacy or data protection regulations.

By accessing or using the Solonix.one platform, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. If you do not agree, you must discontinue your use of our services immediately.

## 2. COLLECTION OF PERSONAL DATA

### 2.1 Categories of Personal Data We Collect

The Company may collect the following categories of personal data from Users:

- Identity information: full legal name, date of birth, gender, nationality, government-issued identification numbers;
- Contact details: residential address, email address, telephone number;
- Financial information: bank account details, payment card information, transaction history, source of funds declarations;
- Technical data: IP address, browser type and version, device identifiers, operating system, time zone and location settings;
- Usage data: pages visited, features used, session duration, clickstream data, search queries;
- Verification data: documents provided for identity verification (KYC), including passports, national ID cards, utility bills, and photographs;
- Communications: records of correspondence between you and the Company, including emails and support tickets;
- Compliance data: information required under our Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) obligations.

## 2.2 How We Collect Personal Data

We collect personal data through the following means:

- Directly from you when you register an account, complete onboarding, submit forms, or communicate with us;
- Automatically through cookies, web beacons, analytics tools, and similar tracking technologies as you use our platform;
- From third-party identity verification providers, credit reference agencies, and fraud prevention services;
- From public registries, databases, or other publicly available sources where permitted by law;
- From financial institutions or payment processors when you initiate transactions through our platform.

## 3. PURPOSES OF DATA COLLECTION AND PROCESSING

The Company processes your personal data for the following purposes and on the corresponding legal bases:

**Account Creation and Management:** To set up and maintain your user account, verify your identity, and provide access to our trading platform. Legal basis: performance of a contract.

**Service Delivery:** To execute trading instructions, process deposits and withdrawals, and deliver the services you have requested. Legal basis: performance of a contract.

**Regulatory Compliance:** To fulfil our legal obligations under AML/CTF legislation, tax reporting requirements, financial services regulation, and data protection law. Legal basis: legal obligation.

**Risk Management and Fraud Prevention:** To detect and prevent fraudulent activity, money laundering, market manipulation, and other unlawful conduct. Legal basis: legitimate interests.

**Customer Support:** To respond to your enquiries, resolve disputes, and improve the quality of our support services. Legal basis: legitimate interests and contract performance.

**Marketing and Communications:** To send you updates, promotional materials, and information about our services, where you have given your consent or where permitted by applicable law. Legal basis: consent or legitimate interests.

**Platform Improvement:** To analyse usage patterns, conduct research, and improve the features and security of our platform. Legal basis: legitimate interests.

**Legal Claims:** To establish, exercise, or defend legal claims, or to comply with judicial or regulatory orders. Legal basis: legitimate interests and legal obligation.

## 4. DATA RETENTION PERIODS

We retain personal data for as long as is necessary to fulfil the purposes for which it was collected, including to satisfy any legal, regulatory, accounting, or reporting requirements.

In particular:

- KYC/AML verification records and transaction data are retained for a minimum of five (5) years following the conclusion of the business relationship, as required by applicable AML/CTF legislation;
- Account information is retained for the duration of your account and for a further period of five (5) years after account closure;
- Communications and support records are retained for three (3) years;
- Technical and usage data collected via cookies and analytics tools is retained for the period specified in our Cookie Policy;
- Where retention is required for the resolution of a legal dispute or regulatory investigation, data will be retained until the matter is fully resolved.

Once the applicable retention period has expired, your personal data will be securely deleted or anonymised in accordance with our data disposal procedures.

## 5. EXTERNAL WEBSITES AND THIRD-PARTY LINKS

Our platform may contain links to external websites, applications, or services operated by third parties. This Policy does not apply to those external sites, and the Company is not responsible for the privacy practices or content of any third-party websites.

We encourage you to read the privacy policy of any external website you visit. The inclusion of a link on our platform does not constitute an endorsement of the third party or its data handling practices.

## 6. YOUR RIGHTS CONCERNING PERSONAL DATA

In accordance with El Salvador's Personal Data Protection Law (Legislative Decree No. 144 of 2024) and other applicable data protection regulations, you have the following rights with respect to your personal data:

### 6.1 Right of Access (Derecho de Acceso)

You have the right to request confirmation of whether the Company holds personal data about you, and if so, to obtain a copy of that data together with information about how it is processed.

### 6.2 Right of Rectification (Derecho de Rectificación)

You have the right to request the correction of inaccurate or incomplete personal data that we hold about you.

### 6.3 Right of Cancellation / Erasure (Derecho de Cancelación)

You have the right to request the deletion of your personal data where it is no longer necessary for the purposes for which it was collected, or where you have withdrawn your consent. This right is subject to any overriding legal obligation to retain the data.

### 6.4 Right of Opposition (Derecho de Oposición)

You have the right to object to the processing of your personal data where that processing is based on our legitimate interests, or to opt out of direct marketing communications at any time.

### 6.5 Right of Portability (Derecho de Portabilidad)

Where processing is based on your consent or on a contract, and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format.

### 6.6 Right of Limitation (Derecho de Limitación)

You have the right to request that we restrict the processing of your personal data in certain circumstances, for example where you contest the accuracy of the data or object to processing.

To exercise any of the above rights, please submit a written request to our Data Protection Delegate at the contact details set out in Section 10. We will respond within the timeframes prescribed by applicable law.

We may need to verify your identity before processing your request. In some cases we may decline a request where we have a legal basis for retaining or continuing to process the data, and we will explain our reasons in writing.

## 7. DISCLOSURE AND SHARING OF PERSONAL DATA

The Company does not sell, rent, or trade your personal data. We may share your personal data with the following categories of recipients only to the extent necessary and lawful:

**Group Companies:** Affiliated entities within the Digital Trading Group of Central America corporate structure, where necessary for the delivery of services or internal administrative purposes.

**Service Providers:** Third-party vendors and processors who provide services on our behalf, including cloud hosting, identity verification, payment processing, cybersecurity, analytics, and customer support. These parties are contractually bound to process data only on our instructions and to maintain appropriate security standards.

**Financial Institutions:** Banks, payment processors, and liquidity providers involved in processing your transactions.

**Regulatory and Law Enforcement Authorities:** Government bodies, regulators, courts, law enforcement agencies, or other public authorities where we are required or permitted to do so by applicable law, including disclosure required under AML/CTF legislation.

**Professional Advisors:** Legal counsel, auditors, and accountants who require access to your data in the course of providing professional services to the Company.

**Business Transfers:** In the event of a merger, acquisition, reorganisation, or sale of assets, your personal data may be transferred to the acquiring entity, subject to the same protections as set out in this Policy.

Where personal data is transferred to recipients outside of El Salvador, the Company will ensure that adequate safeguards are in place in accordance with applicable data protection legislation.

## 8. DATA SECURITY MEASURES

The Company implements and maintains a comprehensive framework of technical and organisational security measures to protect personal data from unauthorised access, loss, alteration, disclosure, or destruction. These measures include, but are not limited to:

- End-to-end encryption of data in transit using industry-standard TLS/SSL protocols;
- Encryption of sensitive data at rest using AES-256 or equivalent encryption standards;
- Strict access controls and role-based permissions to limit data access to authorised personnel only;
- Multi-factor authentication for all system and administrative access;
- Regular penetration testing, vulnerability assessments, and security audits;
- Comprehensive employee training on data protection and information security best practices;
- Incident response and data breach notification procedures in accordance with applicable law;
- Regular review and update of security policies and procedures.

While we take all reasonable steps to safeguard your data, no method of electronic transmission or storage is completely secure. In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the relevant supervisory authority as required by law.

## 9. OTHER PROVISIONS

### 9.1 Children's Data

Our services are not directed at individuals under the age of 18. We do not knowingly collect personal data from minors. If we become aware that we have inadvertently collected data from a minor, we will take prompt steps to delete it. If you believe a minor has provided us with personal data, please contact us immediately.

## 9.2 Automated Decision-Making

In some circumstances, the Company may use automated processes to make decisions about your account or transactions, for example in the context of fraud detection or compliance screening. Where such decisions have legal or significant effects on you, you have the right to request human review, to express your point of view, and to contest the decision.

## 9.3 Cookies and Tracking Technologies

The Company uses cookies and similar tracking technologies on our platform. For detailed information on how we use cookies, the types deployed, and how you can manage your cookie preferences, please refer to our Cookie Policy, available at [www.solonix.one](http://www.solonix.one).

## 9.4 Amendments to This Policy

The Company reserves the right to update or amend this Privacy Policy at any time. Where changes are material, we will notify you via email or through a prominent notice on our platform. Your continued use of our services following publication of any amended Policy constitutes your acceptance of those changes.

## 9.5 Governing Law

This Privacy Policy is governed by the laws of El Salvador. Any disputes arising in connection with this Policy shall be subject to the exclusive jurisdiction of the competent courts of El Salvador.

# 10. DATA PROTECTION DELEGATE

The Company has appointed a Data Protection Delegate (DPD) responsible for overseeing compliance with this Policy and applicable data protection legislation. To exercise your data protection rights, raise a concern, or make a formal complaint, please contact our DPD:

**Data Protection Delegate** – Digital Trading Group of Central America S.A. DE C.V. (Solonix.one)

**Email:** [legal@solonix.one](mailto:legal@solonix.one)

**Website:** [www.solonix.one](http://www.solonix.one)

We aim to acknowledge all data protection enquiries within 5 business days and to respond in full within the timeframe required by applicable law.

# 11. GENERAL ENQUIRIES

For any general questions about this Privacy Policy or our data handling practices that do not constitute a formal rights request, please contact our support team:

**Email:** [support@solonix.one](mailto:support@solonix.one)

**Website:** [www.solonix.one](http://www.solonix.one)

We are committed to addressing all enquiries promptly and transparently. If you are not satisfied with our response, you have the right to lodge a complaint with the competent data protection supervisory authority in your jurisdiction.