

PRIVACY POLICY

1. Introduction

Swissquote Capital Markets Limited (“SQCM” or “Swissquote”) is committed to providing you with the highest quality service. This includes maintaining your privacy and protecting your personal data. This Privacy Policy is issued by Swissquote Capital Markets Ltd, identified as data controller, and is directed to individuals outside our organization with whom we interact, including our (existing and former) clients, prospective clients, direct service providers, affiliated companies, job applicants, visitors to our websites (our “Sites”), and in general any recipients of our services or individuals in direct relationship with SQCM. For clients of SQCM, this policy is to be read in addition to the Terms and Conditions.

We are responsible, as a data controller, for collecting and processing your personal data related to our activities.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the processing of personal data, or changes in applicable law. We encourage you to read this Privacy Policy carefully as it will let you know which personal data we obtain from you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them. We also recommend that you regularly check this document to review any changes we might make in accordance with the terms of this Policy.

By implementing and operating this Policy, we will make your online experience a more secure and enjoyable one.

2. Why have a Privacy Policy?

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, which was transposed into national law, i.e. Law 125(I)/2018, set out important standards regarding information that identifies an individual. This is known as “personal data.”

All organizations processing personal data must do so fairly and lawfully. At Swissquote, we treat all of our obligations seriously and take all the necessary steps to comply with these obligations when we store and process your personal data.

3. What Personal Data do we collect about you?

It is essential for us to collect, store and process only the minimum required amount of personal data so that we can offer and perform our services. We may collect various types of personal data about you, including but not limited to:

- Personal identification data such as name, address, contact details, nationality, place of birth, legal representatives, education.
- Official identification data such as proof of identity and address documents and tax information, including dynamic real time selfies and recorded video calls.
- Electronic identification data such as email address, IP address and electronic signature.
- Banking and financial data such as bank account details, financial situation data (income, assets, credit history) and declared investor profile.
- Your usage and preferences for subscribed products and services including banking, financial and transactional data.
- Marketing preferences such as newsletter subscriptions.
- Phone and electronic conversations.
- Online behavior and preferences when browsing our Sites or using our mobile application through cookies and other browser-generated information (such as IP address, URL, browser information, plug-in types, operating system and platform as well as your login information, your clickstream through our Sites, the products you viewed and page interactions, etc.).
- Data obtained in the course of our exchanges with you, on our Sites, via our applications, during meetings, telephone calls and in emails.
- Data obtained about you through public sources on the Internet.

For corporate and institutional clients, we collect information such as corporate documents of address, shareholders, directors, officers including additional personal information on the Shareholders and Directors. We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

As a general rule, we do not collect personal data related to your health, racial or ethnic origin, political opinions, religious beliefs, trade union membership or data concerning your sex life or sexual orientation.

4. How do we collect personal data?

In most cases, you provide us with the personal data that we process. You may provide us with information:

- when entering into and during the business relationship.
- when you visit our Sites.
- when you log into our Sites and/or use our mobile application.
- when you call us or send us an e-mail, letter or fax.
- when you visit our premises.
- when you request and/or subscribe to new products or services.
- when you take part voluntarily in a survey, provide feedback, apply for special offers and promotions, enter into competitions or register for our events (such as webinars).
- when you fill in one of our forms or sign a contract with SQCM.

However, we may also obtain personal data from other sources such as official authority databases, and databases made publicly available to third parties. We also obtain personal information from website/social media pages. We work closely with third parties (e.g. business partners, technical, payment and delivery service providers, advertising networks, tracking and analytics providers (in-

cluding Google), data aggregators, lead generation agencies, public sources, third party social networking sites and search information providers) and may receive information about you from them. We may also receive personal data about you when we acquire other companies.

5. Why do we collect your personal data?

The personal data collected by SQCM is restricted to the data required for the purposes identified by SQCM. We retain and use your personal data for the following main purposes:

- Legal and regulatory obligations to which SQCM is subject, such as the ones relating to:
 - Anti-money laundering and combating terrorist financing
 - Regulatory reporting to the authorities
 - Detection of unusual transactions.
- Execution of a contract, including pre-contractual measures.
- To pursue SQCM's legitimate interests.

We aim to maintain a balance between these legitimate interests and respect for your privacy. For example, once we have obtained your consent.

6. Who do we share your personal data with and why?

Within Swissquote, your personal data will only be accessed by people who need them for business purposes such as third party service providers, affiliates, banks, payment services providers etc.

To improve the efficiency and quality of the products and services requested by you or to which you have subscribed and to ensure the best possible service and high-quality standard, we may disclose, in accordance with applicable law and for legitimate business purposes, certain personal data to our parent company, Swissquote Group Holding Limited and its affiliated entities, located in Switzerland and the United Kingdom.

In some cases, we are obliged by law to disclose personal data to third parties, such as market and regulatory authorities including tax authorities, regulators and supervisory bodies (notably on occasion to Cyprus Securities and Exchange Commission), public and judicial authorities (such as the police, prosecutors, law courts).

Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third-party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content. In some cases, SQCM also entrusts third parties to provide you with services to which you have subscribed in order to process your personal data, for the purpose of carrying out our contractual relationship with you.

If SQCM is acquired by a third party, personal data held by it about its customers and direct relationships will be one of the transferred assets.

When we work with data processors or transmit personal data to data controllers located in countries outside the European Economic Area (EEA), the countries concerned have been recognized by the European Union as ensuring adequate protection of personal data. In such cases, we take action (for

example, through contractual measures) to guarantee that your personal data are properly secured in the country of destination. More information can be found in our Terms and Conditions.

7. Period for which your personal data is stored

SQCM stores your personal data in accordance with its legal obligations and will only retain your personal data for as long as it is necessary for the stated purpose, namely five (5) years after termination of the business relationship. For legitimate reasons and depending on the circumstances, SQCM may store the data for a longer period as permitted by the applicable legislative and regulatory provisions, maximum seven (7) years.

This means that we may retain your personal data for a reasonable period after your last interaction with us. When the personal data that we collect is no longer required in this way, we destroy or delete it in a secure manner.

8. Data Accuracy

We take reasonable steps designed to ensure that:

- your personal data that we process are accurate and, where necessary, kept up to date and
- any of your personal data that we process that are inaccurate (having regard to the purposes for which they are processed) are erased or rectified without delay.

From time to time, we may ask you to confirm the accuracy of your personal data.

9. Security of your Personal Data

In order to keep your personal data secure, we have implemented a number of physical, technical, organizational and procedural protective measures to minimize the risk that unauthorized parties will be able to access your personal data. These measures include:

- Securing our operating environments that are only accessible to our employees, agents and contractors on a need-to know basis.
- Encrypting all sensitive financial information processed to carry out transactions over our Sites. This security is documented by the use of the secure "https" protocol and the padlock in the URL bar.
- Verifying your identity before you can access, use or make changes to your account so as to prevent any unauthorized access.
- Regular training for all of the employees.

Please note that these data protections measures do not apply to personal data you choose to share in public areas such as on community websites. You can also help to protect your personal data, by following the guidelines below:

- Choose a password that you will be able to remember but that would be hard for someone to guess. Ideally it should include special characters (such as "?" or "#" for example) and numbers. We recommend that you change it regularly and if you need to write it down, always keep it in a safe place;

- Make sure that no-one can see the details you are entering when you log-in;
- Remember to close your browser each time you log-off and end your session and, if possible, clear any history of the websites you have visited and that your browser may have saved or “cached”; and never disclose your account details to anyone;
- Ensure that you use software with the latest security settings;
- Do not leave your IT equipment unattended;
- Log off from your online account when you are not using it;
- Be vigilant and learn how to detect unusual activity, such as new website addresses or phishing emails requesting personal information. You can let us know about any phishing attempts using phishing_cyprus@swissquote.com. SQCM will never ask you for your account numbers, debit or credit card numbers, passwords or codes via e-mail.

To get the most out of our services, please keep your personal data (including your email address) accurate and up to date.

10. Notification

In the event of a personal data breach, SQCM will notify the Commissioner for Personal Data Protection promptly and, when possible, no later than 72 hours after SQCM becomes aware of the data breach. If the breach is likely to result in a high risk to your rights and freedoms, SQCM shall inform you of it promptly.

11. What are cookies and how do we use them?

Swissquote and their third-party providers may use cookies to collect information about you. This helps us to provide you with optimized experience while you use our Sites.

The EU Privacy and Electronic Communications Directive (Amendment) Regulations 2011, known as the Cookie Legislation, transposed in Cyprus through the amendments in the Law 112(I)/2004, requires all businesses operating websites to collect informed consent from visitors for the use of cookies on their equipment before placing cookies or reading cookies on a computer or any other web connected device, like a smartphone or tablet.

It has been designed to protect online privacy, by making you aware of how information about you is collected by websites, what it is used for, and enable you to choose whether or not to allow it to take place.

You can find more information about the cookies we use and the purposes for which we use them below. You can at any time change or withdraw your consent from the Cookie Declaration on our Sites.

12. What are Cookies?

Cookies are small text files placed on your computer, smartphone or other device when you visit our Sites. They allow us to distinguish you from other users, which helps us give you an enhanced navigation experience on our Sites. Cookies allow you to do many things such as log on to your account, apply for products and services online and use financial tools.

13. What cookies do we use?

We use three types of cookies on our Sites: essential cookies, performance cookies and tailored content cookies, as further explained below:

- *Essential cookies* enable you to operate vital functions of our Sites and trading platform. If these are disabled, you may not be able to access the platform or other significant parts of our Sites.
- *Performance cookies* allow us to recognize and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way our Sites work, for example by making sure users are finding what they need easily.
- *Tailored content cookies* allow us to tailor the content of our Sites to suit you and link with other websites, such as social media websites. For example, instead of displaying promotional messages about products you already have, they let us show you other services you might be interested in. We only use tailored content cookies subject to your prior opt-in to that effect and as set by our trusted business partners to provide you with Swissquote products and services and will only show you Swissquote branded advertisements on our Sites.

14. How to disable cookies?

When you visit our Sites, we will ask for your permission to use cookies. If you wish to disable all cookies, you can do this through your browser settings. However, please be aware that cookies are often used to enable and improve certain functions on our Sites. If you choose to opt-out of certain cookies, it is likely to affect how our Sites work.

15. Other technology in use

SQCM uses certain technologies to help manage online advertising (Google Analytics Advertising Features), for general Sites reporting and improvement (Google Analytics) and for serving you personalized ads (AdrollGroup). These technologies manage only anonymized information which does not allow us to identify you personally.

16. Links to other websites

Our Sites may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please be aware that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. SQCM is not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you realize this information is going to a third-party, and you should become familiar with the privacy policy provided by that third-party.

17. Your rights and how to exercise them

In accordance with application regulations, you have a set of rights over your personal information:

- **Right to be informed:** You have the right to be informed about what we do with your personal data, which is why we have made this Privacy Policy available to you on our website.
- **Right to object:** You have the right to ask us not to process your personal data. You can exercise your right to object by contacting our Data Protection Officer at dpo_sqcm@swissquote.com. If you wish to opt out of marketing communications, our emails will also have an 'unsubscribe' option.
- **Rights to access:** Upon your written request, we will send you a copy of the information that we hold about you.
- **Rights to correct:** We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is incomplete or incorrect.
- **Right to delete:** If we hold personal information about you and you want it to be removed from our database or inactivated, please contact our Data Protection Officer at dpo_sqcm@swissquote.com. You can request that we erase your personal data if there is no reason for us to continue using it. This right only applies in certain circumstances, and it is not a guaranteed or absolute right, as we have regulatory and legal obligations in certain circumstances to continue holding Personal Data for the retention period mentioned above, i.e. maximum seven (7) years.
- **Right to request a limited processing:** You have the right in certain circumstances to request that we suspend our processing of your personal data. For example, you have the right to opt out of Marketing emails. Where we suspend our processing of your Personal Data we will still be permitted to store your Personal Data, but any other processing of this information will require your consent, subject to certain exemptions.
- **Right to the portability of some personal information:** When we send a copy of the information that we hold about you, this will be provided to you without undue delay in a structured, commonly used and machine-readable form.
- **Rights not to be subject to automated decision making and profiling:** You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request that we involve one of our employees or representatives in the decision-making process.
- **Right to complaint:** Should you not be satisfied with the way we have responded to your concerns, you have the right to submit a complaint to us in respect to personal data matters. Please refer to our Complaints Policy. If you are still unhappy with our reaction to your complaint, you can escalate it to our Data Protection Officer. You are also entitled to lodge a complaint with the local data protection authority, the "Commissioner for Personal Data Protection" www.dataprotection.gov.cy.

If you would like to exercise the rights listed above, please submit a request in writing with a copy of your Identification Documentation to:

Swissquote Capital Markets Ltd

Data Protection Officer

Spyrou Kyprianou 42, Emerald House, Limassol, Cyprus

dpo_sqcm@swissquote.com

If you wish to contact our Customer Support, please contact us:

Swissquote Capital Markets Ltd

Customer Support Service

Spyrou Kyprianou 42, Emerald House, Limassol, Cyprus

Support_sqcm@swissquote.com

Phone: +357 25 263 500

18. Change to the Privacy Policy

We keep our Privacy and Cookies Policy under regular review and, consequently, it may change at any time in the future. We will place any updates on our Sites. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.