



As part of BrightPool Limited's day-to-day business we need to collect personal information from visitors to our website to ensure that we can meet their needs for a range of financial services and provide them with information about our services.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This notice outlines how we manage your personal information supplied to us by you or a third party in connection with your use of our website(s). It also details your rights in respect of our processing of your personal information.

Our privacy notice will be reviewed from time to time to take account of new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy notice.

Please note that if you are a BrightPool Limited employee, a contractor to BrightPool Limited or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies that we may provide to you independently of this document.

Any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any visitors to our website, unless otherwise stated.

### WHO ARE WE?

This privacy notice applies to the processing activities of BrightPool Limited, with its physical address at 169-171 Arch, Makarios III Avenue, Cedars Oasis Building, 9th Floor Office 902, Limassol, 3027, Cyprus and its registered business address at Helios Court, 3rd Floor, 221 Christodoulou Chatzipavlou Street, 3036 Limassol, Cyprus, in connection with the BrightPool website (the 'Website'). It includes the processing of any personal information you may provide through use of the Website.

This privacy notice also applies to the processing of personal information by affiliated companies of BrightPool Limited who provide back office services and to the processing activities of this group of companies generally.

Any reference to 'us', 'our' or 'we' in this privacy notice is a reference to BrightPool Limited and/or the relevant group company as the context requires unless otherwise stated.

### WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

#### PROCESSING OF PERSONAL INFORMATION IN CONNECTION WITH THE USE OF THE WEBSITE

If you use our Website, we may collect the following types of information about you:

- marketing and communications data such as your marketing and communication preferences;
- technical data such as information collected when you access our Website, your internet protocol (IP) address, your login details, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, and platform and other technology on the devices you are using; and
- usage data (such as information about how you use our Website).

We may also obtain personal information about you through the use of cookies on our Website, in particular by recording which pages you look at on our Website.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

#### USE OF COOKIES/TECHNOLOGICAL IMPROVEMENTS/THIRD-PARTY WEBSITES

##### • WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

A cookie is a small piece of text stored on your computer or device when you visit a website or an app. We use cookies on our Website to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. For further information about cookies and how we use cookies, please refer to our Website.

##### • TECHNOLOGY IMPROVEMENTS

We are constantly striving to improve the functionality of our Website through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy notice at the time of the change.

##### • LINKS TO THIRD PARTY WEBSITES

Our Website may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

#### HOW DO WE USE YOUR PERSONAL INFORMATION?

#### PROCESSING PURPOSES IN CONNECTION WITH THE USE OF THE WEBSITE

If you use our Website, we may use personal information for the following purposes:

##### • TO HELP US IMPROVE OUR PRODUCTS AND SERVICES, INCLUDING CUSTOMER SERVICES, AND DEVELOP AND MARKET NEW PRODUCTS AND SERVICES

We may from time to time use personal information provided by you through your use of our Website to help us improve our products and services. It is in our legitimate interests for us to use your personal information in this way to ensure that we provide you with the best products and services we can and to continue to be a market leader in our industry.

##### • TO INVESTIGATE OR SETTLE ENQUIRIES OR DISPUTES

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.

##### • TO COMPLY WITH APPLICABLE LAW, COURT ORDER, OTHER JUDICIAL PROCESS, OR THE REQUIREMENTS OF ANY APPLICABLE REGULATORY AUTHORITIES

We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

##### • DATA ANALYSIS

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

##### • MARKETING BY US

We may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing communications we will either do so as it is in our legitimate interest or with your consent.

##### • SECURITY

If you enter any of our premises we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

## WHO MAY WE DISCLOSE PERSONAL INFORMATION TO?

In the course of using your personal information for the purposes stated in the section "How do we use your personal information?" we may disclose your information to:

- affiliated companies of BrightPool Limited who provide back office services;
- service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services;
- courts, tribunals and applicable regulatory authorities as agreed or authorised by law; and
- anyone authorised by you.

Generally, we require organisations that are not affiliated to BrightPool Limited who handle or obtain personal information to acknowledge the confidentiality of this information, to undertake to respect any individual's right to privacy and to comply with the all relevant data protection laws and this privacy notice.

Third party service providers may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this privacy notice and is not subject to our privacy standards and procedures.

## HOW DO WE OBTAIN YOUR CONSENT

Where our use of your personal information requires your consent, such consent will be provided in accordance with the applicable contract we may have entered into with you or as set out in our communication with you from time to time. If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this privacy notice.

## MANAGEMENT OF PERSONAL INFORMATION

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, we train our employees who handle personal information to respect the confidentiality of personal information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

We have appointed a Data Protection Officer to ensure that our management of personal information is in accordance with this privacy notice and the applicable legislation.

## HOW DO WE STORE PERSONAL INFORMATION AND FOR HOW LONG?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We delete your personal information once it is no longer reasonably necessary for us to keep it for the purposes for which it was collected or, where we have relied on your consent to keep your personal information, once you have withdrawn your consent for us to do so, and we are not otherwise legally permitted or required to keep the data.

However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to maintain records of the services we provide for a period of five years from the date of their creation/after our business relationship with you has ended.

If we hold any personal information in the form of a deed, we will hold this deed in its complete form for a period of 12 years after our business relationship with you has ended.

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

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

## TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA

We may transfer your personal information outside the European Economic Area to affiliated companies of BrightPool Limited as well as processors who are engaged on our behalf ("Transferees"). For example, currently we have affiliated companies located in the USA, Singapore, Australia, Japan, China, India, the UAE, South Africa and Switzerland. To the extent we transfer your information outside the European Economic Area, we will ensure that the transfer is lawful and that there are appropriate security arrangements.

In order to transfer personal information to third parties in territories that do not have a finding of adequacy by the applicable authority and regulations, we enter into agreements with the Transferees ensuring appropriate and suitable safeguards based on standard contractual terms adopted by the European Commission.

Where we make transfers to Transferees in the US, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements. If you would like a copy of such arrangements, please contact us using the contact details below.

## WHAT LEGAL RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL INFORMATION?

The information about any rights that might be available to you in relation to the personal information we hold about you is set out below.

### • ACCESS

If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable administration fee.

### • RECTIFICATION

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### • ERASURE

You can ask us to delete or remove your personal information in certain circumstances such as where we no longer need it or you withdraw your consent (where applicable) provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations and subject to the section "How do we store personal information and for how long?". If we have shared your personal information with others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### • PROCESSING RESTRICTIONS

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information though. We will tell you before we lift any restriction. If we have shared your personal information with others, we will let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### • DATA PORTABILITY

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this information to a third party of your choice.

### • OBJECTION

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- processing your personal information for direct marketing; or
- processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.

### • AUTOMATED DECISION-MAKING AND PROFILING

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you, you can ask to not be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even where a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention.

To enable us to process your request, we may require that you provide us with proof of your identity, such as by providing us with a copy of a valid form of identification – this is to ensure that we appropriately protect the personal data we hold from unauthorised access requests and comply with our security obligations.

## WHAT LEGAL RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL INFORMATION? (CONTINUED)

### • RIGHT OF WITHDRAWAL

If we process your personal information on the basis of your consent, you also have the right to revoke your consent without this affecting the lawfulness of the processing carried out prior to the revocation.

## WHAT IF YOU HAVE A COMPLAINT?

If you have a concern about any aspect of our privacy practices, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact us via one of the methods set below.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with a data protection authority, in particular in the EU Member State where you are residing or working or where there has been an alleged breach of applicable data protection laws.

## HOW TO CONTACT US

If you have any questions about this privacy notice or want to exercise your rights, please contact us by:

- telephone on +357 25 552 530 or +442076335427;
- email at [compliance@brightpool-markets.com](mailto:compliance@brightpool-markets.com); or
- writing at the address provided in the "Who are we?" section of this privacy notice.

## GOVERNING LAW AND JURISDICTION

This privacy notice and all our dealings with you are in all respects governed by and construed and interpreted in accordance with the laws of the Republic of Cyprus, and the Cypriot courts will have non-exclusive jurisdiction to settle any legal action or proceedings arising out of or in connection with this privacy notice, including any non-contractual disputes and claims. Nothing in this term will prevent us from bringing proceedings against you in any other jurisdiction.

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## CHANGES TO OUR PRIVACY NOTICE

We have the right to update the contents of this privacy notice from time to time to reflect any changes in the way in which we process your personal information or to reflect legal requirements as these may change. In case of updates, we will post the revised privacy notice on our Website. Changes will take effect as soon as the revised version is made available on our Website.