



PRIVACY POLICY

Applicability

This Document is effective from September 2021 and shall remain effective until a more recent version is released. Magnasale reserves the right to amend or supplement this Document at any time. This Document does not replace our Standard terms of business which we ask that you read carefully before you enter into any trading. The English version of this agreement is the governing version and shall prevail whenever there is any discrepancy between the English version and the other versions.

The protection of privacy and the safeguarding of our Clients' personal and financial information is of great importance to us. If you have any questions about this Privacy Policy or the processing of your Personal Information, please contact us at privacy@magnasaleltd.com or by sending a letter to our offices in Cyprus at the following address: 148 Strovolou Ave., Strovolos, 2048 Nicosia, Cyprus.

Magnasale Trading Limited is a company incorporated under the laws of Cyprus, the registered office of which is at 148 Strovolou Ave., Strovolos, 2048 Nicosia, Cyprus ("Magnasale") and is an investment services firm regulated in the conduct of its activities by the Cyprus Securities and Exchange Commission ("CySEC") under license number 264/15 and its activities include the receipt, transmission and execution of client orders in financial instruments, including through the use of electronic trading platforms.

Finalto Europe is a global brand used and owned by Magnasale. Magnasale is subsidiary of Playtech Plc, a company traded on the London Stock Exchange's Main Market and a constituent of the FTSE 250 index. **PLEASE VIEW THE FOLLOWING PRIVACY POLICY STATEMENT WHICH CLEARLY EXPLAINS HOW WE COLLECT, PROCESS, STORE AND PROTECT OUR CLIENTS' INFORMATION.**

References in this Policy to "**Personal Data**" are references to "Personal Data" as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "GDPR").

References in this document to "**Associate**" are references to an undertaking being a member of our Group, a representative whom we or another undertaking of our Group appoint, or any other person with whom we have a contractual, agency or other relationship that might reasonably be expected to give rise to a community of interest between us and them.

References in this document to "**Group**" are references to Magnasale and any entity controlled by or controlling Magnasale and entities under common ownership and control with Magnasale where "control" means direct or indirect control, of at least 20% of the voting rights or capital of an undertaking;

When collecting, processing and storing Personal Data provided by you, we are subject to the provisions of the Personal Data Law.

We, our Associates, any persons deriving rights from us or our Associates, any members of our Group, agents or sub-contractors which we engage or work through for the purpose of collecting, storing and processing Personal Data and any third parties acting on our or their behalf ("**Third Parties**") may collect, process use and store Personal Data provided by you for the purposes of, or related to, carrying out the transactions and other services which we provide to you, operational support and development of our or their businesses, providing us or them with professional or other services, in enforcing our or their contractual or other rights, and for the purposes of enabling compliance with the contractual, legal and

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regulatory provisions anywhere in the world to which we or our Associates and Third Parties are subject. By opening an account, you hereby consent to such collection, processing, storage and use of Personal Data by us, our Associates or Third Parties in accordance with the provisions contained herein, and agree that processing and storage of Personal Data provided to us by you.

may be carried out in or from any jurisdiction within or outside of the European Union including in or to countries or territories which do not offer the same level of protection of Personal Data as is enjoyed within the European Union.

You further represent and undertake that where you are a non-physical person providing to us Personal Data of any individual or where you are an individual providing us with Personal Data of any individual other than yourself, by opening an account with us you thereby undertake and represent that such person, whose Personal Data is collected, stored and processed in accordance with the provisions contained herewith, has been informed of and has given their consent to such collection, storage and processing of their Personal Data in accordance with the provisions contained herein and that they have been informed of their rights in relation to their Personal Data which is held and processed in accordance with the provisions contained herein.

COLLECTION OF PERSONAL INFORMATION

Magnasale collects the necessary information required to open, transact and safeguard your assets and your privacy and to provide you with the services you require. To this end, Magnasale gathers information from you and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources (such as ID3Global) which help us profile your requirements and preferences and provide better services to you. The information Magnasale collects may include:

1. Application information

Personal information you provide us in your application form, such as your name, address, date of birth, email address, income and income source etc. in order to facilitate the evaluation of your application. The information you provide us is also used for the purposes of communicating with you.

2. Transaction information

Information about the anticipated volume and value of your transactions with us and income information provided in order to enable the construction of your economic profile.

3. Verification information

Information necessary to verify your identity, such as an identification card, passport or driver's license. This also includes background information we receive about you from public records or from other entities not affiliated with Magnasale.

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USAGE OF PERSONAL INFORMATION/OPT OUT

Magnasale uses Personal Data only as required to provide quality service to you. This information helps improve services, customize browsing experience and enables us to inform you of additional products, services or promotions relevant to you and the products and services you require and you consent to us using this data for such purposes.

If you do not want to receive information of this nature for any reason, please contact us at the following address: privacy@magnasaleltd.com or by sending a letter to our offices in Cyprus at the following address: 148 Strovolou Ave., Strovolos, 2048 Nicosia, Cyprus.

PROTECTION OF PERSONAL INFORMATION

Any personal information you provide us will, subject to our Institutional Client Trading Agreement, be treated as confidential and shared only within Magnasale and its Associates and will not be disclosed to any third party except under any regulatory or legal proceedings.

The personal information that you provide in connection with registering yourself as a Client of Magnasale is protected in many ways. You can access your registration Information through a password selected by you. This password is encrypted and known only to you and shall not be revealed to anyone else.

Registration Information is safely stored on secure servers that only authorised personnel have access to via password. Magnasale encrypts all personal information as it is transferred to Magnasale and thus makes all necessary effort to prevent unauthorised parties from viewing any such information.

HOW LONG DO YOU RETAIN THE PERSONAL DATA?

Once your Agreement with us terminates, we shall keep your Personal Data provided to us, including but not limited to your name, address, email, phone number, your trading and transaction history, deposits and withdrawals history, for at least 5 (five) years, as is required under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (“MiFID II”). Where we keep and process your personal data for marketing purposes based on your consent, we shall retain it until your consent is withdrawn or ceases to be valid.

However, depending on your country of residence and/or citizenship, there may be different statutes of limitation in force. A “statute of limitations” is a statute prescribing a period of limitation for the bringing of actions or claims of certain kinds, which means that, depending on the jurisdiction, you have the right to bring a claim against Magnasale in connection with your trading with Magnasale only during a certain period of time (the “Limitation Time”). We have a legitimate interest in retaining your personal information (such as your ID, address, transactional and trading history with us and records of your communications with us) in order to enable us to defend ourselves against any such claim that you may

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have. Accordingly, such personal information shall be retained by us after the date of expiration or termination of the Agreement during the Limitation Time.

YOUR RIGHTS

Right of Access to the Personal Data which we hold

You have a right, upon request, to be provided with information as to your Personal Data which we hold and which is subject to processing as well as to request copies of documents with your Personal Data where this is not disproportionately burdensome for us.

YOU HAVE A RIGHT TO REQUEST, AND BE PROVIDED WITH THE FOLLOWING:

- (a) Information regarding all your Personal Data which we hold and which has been subject to processing as well as information as to how such data was obtained, the purpose for which the data is processed, the recipients, the categories of data processed or to be processed, the processing which has taken place since the data subject was last updated regarding the processing and the rationale behind the automated processing system,
- (b) Any correction and deletion of your Personal Data which has not been processed in accordance with the applicable requirements due to lack of information or discrepancies
- (c) Any notification made to any third party as to any amendments made in accordance with (b) above, unless this would be disproportionately burdensome for us.

Where we do not provide you with a reply within 4 weeks of your request, you have the right to submit a complaint to the Data Protection Commissioner of Cyprus.

We note that we may refuse to provide you with information in accordance with the provisions of this paragraph where to do so would jeopardize the investigation or adjudication of criminal proceedings or where this would jeopardize political, financial and fiscal stability.

Where you request information in accordance with the provisions of this paragraph, we may impose a reasonable fee in respect of the cost to us in providing such information and/or documentation. Where a request for amendment of your Personal Data is well founded, we will return to you any fees paid in connection with this and we will provide you with a copy of the amended record of your Personal Data, free of charge.

RIGHT TO OBJECT TO THE PERSONAL DATA WHICH WE HOLD

You have the right to oppose the processing of your Personal Data where this is imperative and for legitimate purposes which are directly related to your personal circumstances.

Your right to object to the processing of your Personal Data, in accordance with the above, must be exercised in writing. We may accept any such request or we may reject it providing reasons for such

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rejection. In the case of our failure to reply or our rejection of your request, you may submit a complaint to the Data Protection Commissioner of Cyprus in relation to such rejection.

The processing of your Personal Data by us is essential in order for us to be able to provide you with services and enter into transaction with you, as well as for the purposes of compliance with the legal and regulatory obligations to which we are subject. As such, although you are not required to provide Magnasale any of the Personal Data that we may request, please note that failure to do so could result in Magnasale not being able to open your account or provide you with the service you require.

Whilst we attempt to ensure that all the information we hold about you is current, accurate and complete, we urge you to immediately contact us if any of your personal details have changed.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Your personal information may be transferred or disclosed to any company within the Group or, subject to appropriate agreements and arrangements to ensure data protection, to third parties, for the processing of that personal information based on our instructions and in compliance with this policy and any other appropriate confidentiality and security measures.

1. Within the Group

Magnasale may share information to the Associates within its Group and their respective legal, accounting, tax and financial advisors in the event such information is reasonably required by such Associates for the following purposes:

- Account set up, verification and management;
- Marketing and event;
- Risk management; and
- Legal and regulatory obligations.

Where we share your personal data within the Group, we may share it, and you consent to us sharing it, with the following Associates:

- a) Safecap Investments Limited, a company incorporated in Cyprus, acting as service provide for human resources purposes offering services to you;
- b) Finalto (UK) Limited, a company incorporated in the United Kingdom, our liquidity provider and hedging counterparty, for the purposes of hedging of our trading exposure to you;
- c) TradeFX CY Limited, a company incorporated in Cyprus, a provider of dealing services to us;
- d) Lane Square Enterprises Limited, a company incorporated in the Isle of Man, a provider of IT

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technology services to us

- e) Trade Tech T.A.S. Ltd, a company incorporated in Israel, a provider of IT development and IT maintenance services to us; and
- f) KSTT Services Ltd, a company incorporated in Ukraine, a provider of IT development and IT security services to us.

Each of the above Associates is under 100% control of the Group.

2. Non-Affiliates Third Parties

Magnasale does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Statement.

Magnasale reserves the right to disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to you.

To help us improve our services, Magnasale may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. Use of the shared information may also be used to provide professional, legal, or accounting advice to Magnasale. Use of shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which Magnasale shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way Magnasale protects the same. Magnasale will not share personal information with third parties which it considers will not afford its Clients the required level of protection.

Where you have been introduced to us by a Business Introducer, such Business Introducer may have access to your personal information. You hereby unambiguously and unequivocally consent to the sharing of personal information with such Business Introducer.

Furthermore, and for the purposes of fulfilling our regulatory requirements concerning transaction reporting, we are sharing your data with the following third parties:

- a) Cappitech Regulation Ltd, a company incorporated in Israel and regulated by the Israel Securities Authority (ISA), reference number 515328953;
- b) Regis-TR S.A., a company incorporated in Luxembourg and regulated by the European Securities and Markets Authority as an approved Trade Repository, reference number B157650; and
- c) Xtrakter Limited (trading as Trax), a company incorporated in the United Kingdom and regulated by

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the Financial Conduct Authority, as an approved Data Reporting Services Provider for the provision of Approved Reporting Mechanisms (ARM) and Approved Publication Arrangements (APAs) services, reference number 01917944.

Personal information to which read-only access may be given includes information such as name, residency details, contact details (such as email and phone number) and trading activity. If you do not wish for your data to be shared with the third-party business introducer, you can withdraw your consent by notifying us via email.

REGULATORY DISCLOSURE

We will share with third parties your personal information when we believe it is required to so for legal and regulatory reasons, including but not limited to:

- i. To comply with our legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence. Without limitation to the generality of the foregoing, Magnasale, as a regulated Cyprus Investment Firm, is required to comply with certain obligations under the Intergovernmental Agreement between Cyprus and the United States and has taken all reasonable steps to be considered in compliance with The Foreign Account Tax Compliance Act (FATCA);
- ii. In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings); and
- iii. To protect our rights, customers, systems, and Platforms.

The Client acknowledges and accepts that Magnasale is required to disclose information in relation to any US reportable persons to the relevant authorities, in accordance with the reporting requirements of FATCA. The Client may contact Magnasale for additional information or clarifications prior to the signing of this Agreement.

Countries outside the European Economic Area (“EEA”) do not always have strong data protection laws. Where we transfer your personal information from the EEA to other countries in which applicable laws do not offer the same level of data privacy protection as the EEA states y, we take measures to provide an appropriate level of data privacy protection. For example, we use approved model contractual clauses, other measures designed to ensure that the recipients of your personal information protect it. We take steps to ensure that the information we collect is processed according to this privacy policy and the requirements of the applicable

YOUR RIGHTS UNDER GDPR

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Under the GDPR, you, as a data subject have certain rights which are detailed below. Some of these only apply under specific circumstances and are qualified in several respects by exemptions in data protection legislation. We will advise you in our response to your request if we are relying on any such exemptions.

- i. **Access to Personal Data:** You have a right to request a copy of the personal information that we hold about you. Should you wish to make such a request, please contact us via email or by sending a letter to our offices in Cyprus at the following address: 148 Strovolou Ave., Strovolos, 2048 Nicosia, Cyprus. You should include adequate information to identify yourself and such other relevant information that will reasonably assist us in fulfilling your request. Your request will be dealt with as soon as possible.
- ii. **Correction of Personal Data:** You can request us to rectify and correct any Personal Data that we are processing about you which is incorrect.
- iii. **Right to withdraw consent:** Where we have relied upon your consent to process your Personal Data, you have the right to withdraw that consent. Should you wish to make such a request, please contact us via email or by sending a letter to our offices in Cyprus at the following address: 148 Strovolou Ave., Strovolos, 2048 Nicosia, Cyprus.
- iv. **Right of erasure:** You can request us to erase your Personal Data where there is no compelling reason to continue processing. This right only applies in certain circumstances, it is not a guaranteed or absolute right (for example, we may retain your data as described in Section 4 above).
- v. **Right to data portability:** This right allows you to obtain your Personal Data that you have provided to us with your consent or which was necessary for us to provide you with our products and services in a format which enables you to transfer that Personal Data to another organisation. You may have the right to have your Personal Data transferred by us directly to the other organisation, if this is technically feasible.
- vi. **Right to restrict processing of Personal Data:** You have the right in certain circumstances to request that we suspend our processing of your Personal Data. 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.
- vii. **Right to object to processing of Personal Data:** You have the right to object to our use of your Personal Data which is processed on the basis of our legitimate interests. However, we may continue to process your Personal Data, despite your objection, where there are compelling legitimate grounds to do so or we need to process your Personal Data in connection with any legal claims.
- viii. **Rights relating 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. We are satisfied that we do not make automated decisions of this nature.

RESTRICTION OF RESPONSIBILITY

Magnasale is not responsible for the privacy policies or the content of sites www.magnasaleltd.com links to, and has no control of the use or protection of information provided by Client or collected by those

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sites. Whenever a Client elects to link to a co-branded website or to a linked website, the Client may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

USE OF "COOKIES"

Our website, www.magasaleltd.com, uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Magnasale may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. The information collected by the advertising company is not personally identifiable.

PRIVACY STATEMENT UPDATES

From time to time, Magnasale may update this Privacy Policy Statement. In the event Magnasale materially changes this Privacy Policy Statement including how we collect, process or use your Personal Data, the revised Privacy Policy Statement will be posted on the website while keeping you informed. Any dispute over our Privacy Policy Statement is subject to this Notice and our Terms and Conditions. Magnasale encourages Client to periodically check back and review this policy so that Client always will know what information Magnasale collects, how Magnasale uses it, and to whom Magnasale may disclose it.

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AGREEMENT

I have read, understood and agree with the terms of this Privacy Policy Statement, and I confirm that I have full power and authority to be bound by the terms of this Privacy Policy Statement.

For any queries or further information in relation to this Privacy Policy please Contact Us or by sending a letter to our offices in Cyprus at the following address: 148 Strovolou Ave., Strovolos, 2048 Nicosia, Cyprus.

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