

PRIVACY POLICY

Version 1.1

Octa Markets Cyprus Limited

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A. INTRODUCTION

Octa Markets Cyprus Limited (hereafter “**the Company**”, “**the CIF**”) has established, implemented and maintains an effective Privacy Policy informing on the procedures regarding the collection, use and disclosure of personal information obtained or received when visiting the Company’s website and when using any service available through the Company’s website.

The protection of privacy and the safeguarding of the Company’s Clients’ personal and financial information is of great importance to the Company.

Data Protection Law states that the personal information the Company holds about the Client must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to the Client and not used in any way that is incompatible with those purposes;
- Relevant to the purposes the Company has already informed the Client about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have informed the Client about; and
- Kept securely

The Company is responsible for the protection of the privacy and the safeguarding of Clients’ personal and financial information. By opening an account or establishing a business relationship with the Company, the Client gives his/her consent to such collection, processing, storage and use of personal information by the Company.

The Company respects the privacy of its Clients, understands its importance and maintains Personal Data, trusted and confidential information provided by its Clients as one of its highest priorities. The Company is committed to maintain the confidentiality, integrity and security of personal information in relation to current and prospective Clients by respecting their right to keep their personal information confidential. In order to prevent unauthorised access and/or disclosure, the Company has in place suitable physical, electronic and/or managerial procedures and controls to ensure and/or safeguard and/or secure the security and confidentiality of the information provided by its Clients and protect against unauthorised access and/or use of clients’ records and/or information.

The following Privacy Policy clearly explains how the Company collects, processes, stores and protects Clients’ information.

References in this document to “Personal Data” means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Each entity which collects or receives Clients' data under the Privacy Policy does so as a data controller. Any employee of the Company may use and share within the Company the information the Client provides and other information it holds about the Client for the purposes set out in the Privacy Policy, applying appropriate security measures to keep the Client's information safe and secure.

As a rule, the Company refrains from any type of disclosure of personal and/or non-public information when such disclosure is not directly linked to service its Clients. The Company collects the necessary information required to open a Client's account, establish a business relationship and to provide Clients with the services they require.

The purpose of this Policy is to explain to the Clients:

- what Personal Data of the Client the Company collects;
- how the Company uses the Client's Personal Data;
- how, with whom and when the Client's Personal Data is shared;
- the Client's rights; and
- other useful privacy and security related matters.

When collecting, processing and storing Personal Data provided by the Client, the Company is subject to the provisions of the GDPR and the relevant Personal Data protection Laws and Regulations of the EU and the Republic of Cyprus.

B. DEFINITIONS

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'filing system' means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with, the applicable data protection rules according to the purposes of the processing;

‘third party’ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process Personal Data;

‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he/she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him/her;

‘personal data breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

C. COLLECTION OF PERSONAL DATA

Octa Markets Cyprus Ltd collects Personal Data from the Client when he/she applies for a trading account with the Company and throughout the time of doing business with the Client including when the Client visits the Company’s website or communicate with the Company. When completing the Company’s live or demo account opening application form at the Company’s website, www.octafx.eu (the “Website”), the Company collects Personal Data including but not limited to:

- name,
- address,
- date and place of birth,
- gender,
- email address,
- IP address,
- tax identification number (TIN)/social insurance number,
- tax domicile,
- nationality,
- phone number(s),
- professional background,
- employment, profession and income source,
- deposit/withdrawal method details,
- bank account/card details,
- trading knowledge and experience,
- professional knowledge and experience
- proof of identity (POI) such as identification card (ID) or passport,
- proof of residence (POR) such as utility bills and bank statements,
- source of funds such as payslips and bank statements and
- other personal information we require to meet the Client’s needs and provide the Company’s services.

The Company requests certain 'Know Your Customer' (KYC) documentation in accordance with the Fourth (4th) and Fifth (5th) Anti-Money Laundering (AML) Directive (EU), as adopted by the Republic of Cyprus through the AML Legislation (Law No. 188(I)/2007), as in force and/or as this may be amended from time to time, which amongst other information they also include personal information. Further, the Company adheres to the regulations of the Office of the Commissioner of Personal Data Protection of the Republic of Cyprus & the General Data Protection Regulation (GDPR) as in force and/or as this may be amended from time to time.

This is used in order for the Company to facilitate the evaluation of the Company's application and complete the relevant KYC, AML and appropriateness assessments that we are required to under the laws and regulations applicable to the Company. The Company also uses this information for the purposes of communicating with its Clients. The Company may collect details of the Client's e-mail at the moment when the Client fills them in on the Website's landing page to create an account but before the Client fully complete the registration process.

The Company requests and acquires information on personal and financial details to be provided by a current/prospective clients, either on, but not limited to, relevant agreements and questionnaires in order to identify the Client, create the economic profile of the Client, verify the Clients' identity provide, deliver and develop products and services, assess the Clients' appropriateness for the services and/or products offered by the Company, in order to service and maintain a Clients' account process Clients' transactions, respond to relative and/or additional inquiries and/or clarifications to either the Clients and/or their authorised representatives and to keep the Client updated on any Client business relationship relative matter and information on the Company's services and/or products.

The Company may also collect information from the Client if the Client requires technical assistance or customer support.

As part of the Company's verification procedure which the Company performs in accordance with the requirements of the applicable laws and regulations, the Company also collect information necessary to verify the Client's identity, such as an identification card or passport. This information can also be obtained or verified by matching it with personal background information the Company receives about the Client from public records or from other entities not affiliated with Octa Markets Cyprus Ltd.

Additional information the Company may collect:

The Company may (but not necessary shall) also collect the following information:

- location data and other IT communication data (including IP address and browser type) collected when the Client access and use the Company's electronic trading platforms or websites;
- information about devices that the Client uses when accessing the Platforms including unique device identified;
- products the Client trades and their performance, including the amount invested;
- pages (including the Website and all of their inner pages/Landing pages/) visited and content viewed, links and buttons clicked, URLs visited before and after the Client visits our Website (the "Web Data"). For more information about cookies and how to manage them please see below "Use of Cookies" within section J;

- Information about the anticipated and actual volume and value of the Client's transactions with the Company, payment methods and information provided in order to enable the construction of the Client's economic profile;
- the Client's telephone, email, SMS or Live Chat conversations with Octa Markets Cyprus Ltd's customer support specialists;
- the Client's social media profile details (name, profile photo and other information the Client makes available to the Company, if any) when the Client connects with or contact the Company through a social media account; and
- information from third party databases to comply with the Company's legal and regulatory obligations. Information necessary to verify the Client's identity, such as an identification card or passport. This also includes background information the Company receives about the Client from public records or from other entities not affiliated with Octa Markets Cyprus Ltd.

Octa Markets Cyprus Ltd collects the necessary information required to open, transact and safeguard Clients' money and the Client's privacy and to provide the Client with the services the Client requires. To this end, Octa Markets Cyprus Ltd gathers information from the Client and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources (such compliance verification databases and similar service providers) as legally and regulatory obliged.

For the purposes of GDPR, Octa Markets Cyprus Ltd acts as data controller in respect of the Personal Data that the Company collects from the Client.

The legal basis that the Company relies on for processing the Client's data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- Where the Client has provided the required consent to allow the Company to use the Client's data in a certain way; or
- Where the processing is necessary to carry out the performance of a contract with the Client; or
- Where the processing is necessary for the Company to comply with a legal and/or regulatory obligation; or
- Where it is in the Company's legitimate interests to perform the Company's functions.

D. HOW DOES THE COMPANY USE CLIENT'S PERSONAL DATA?

The Company uses Personal Data only as required to comply with regulatory requirements and/or provide quality service to the Client. This information assists the Company to improve its services, customise browsing experience and enables it to inform its Clients of additional products, services or promotions relevant to Clients and in this respect the Client needs to provide his/her consent to the usage of this data for such purposes (**See Appendix 1**).

Octa Markets Cyprus Ltd processes the Client's Personal Data for the following purposes:

- Account setup, verification and management.** The Company uses personal information such as the Client's name, ID/passport details, email address, phone number, and information about the Client's device to open and administer the Client's trading account with Octa Markets Cyprus Ltd, provide technical and customer support and training, verify the Client's identity, process payment information and send to the

Client important information about the Client's account with the Company and the Company's services. This information is required for the purposes of complying with the laws and regulations applicable to the Company.

To verify the Client's identity, age and accuracy of the Client's registration details provided, the Company may disclose such information to third parties e.g. financial institutions and third-party reference agencies and data verification service providers. This is required for the purpose of the Company complying with its legal obligations.

ii. Complaints. The Company may also use such personal information to consider any concerns or complaints the Client may have and/or in the event this becomes necessary for the purposes of any legal action or claim that the Client or the Company may have against each other with regard to the Company's services.

iii. Personalisation. Having acquired the Client's consent, the Company may use the Client's personal information, including but not limited to the professional background details and the account trading history to determine, deliver and/or suggest tailored solutions to the Client to personalise the Client's experience with the Company's services in line with the Client's background, prior exposure to financial markets and the Client's general experience in trading. This type of processing is necessary for the purposes of the Company's legitimate interests in developing, delivering or presenting relevant personalized services and content to the Company's Clients.

iv. Marketing. Subject to any preferences the Client have expressed (where applicable), the Company may use the Client's personal information, including but not limited to the Client's name, e-mail, address, phone number, location and Web Data, to deliver marketing and event communications to the Client across various platforms, such as social networks, email, telephone, text messaging, direct mail, online, or otherwise. The Company will do this either (i) until the Client withdraws his/her consent (or it ceases to be valid) or (ii) during the period of the Client's relationship with the Company and, unless specifically instructed otherwise by the Client, for a reasonable period of time after the relationship has ended in order to inform the Client about products, services, promotions and special offers which the Company thinks may be of interest to the Client.

If the Company sends to the Client a marketing email or other marketing communication, it will include instructions on how to opt out of receiving these marketing communications in the future. The Client can also manage his/her information and update his/her marketing preferences by emailing dpo@octafx.eu.

The Company shall require up to seventy-two (72) hours to process any changes the Client makes to his/hers marketing preferences. The Company notes that even if the Client opts out of receiving marketing communications, the Company may still send to the Client important information related to his/her account(s) with the Company and its services.

v. Risk Management. In order to provide the Client the Company's services and comply with the regulatory obligations, the Company shall process the Client's Personal Data as needed to evaluate and manage risks to the Company's business. The types of Personal Data that the Company may process for these purposes includes, but it is not limited to, the Client's trading history and patterns (which may be required to identify and prevent abusive trading and other unlawful trading practices), the Client's name, ID/passport and residence details.

- vi. Diagnostics, research and development.** The Company may use the Client's personal information for internal research and development purposes, to help diagnose system problems, to administer the Company's websites, to improve and test the features and functions of the Company's services to its Clients, to develop new content, products and services. Further, to carry out testing and analysis. This processing is necessary for the purpose of the Company's legitimate interests.
- vii. Legal and regulatory obligations.** The Company may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; or fraud. The Company may also use personal information to meet its internal and external audit requirements, information security purposes, and as the Company otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside the Client's country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside the Client's country of residence; and (c) to enforce the terms of the Agreement, or for the purposes of defending any claim the Client may have against the Company in connection with the Client's trading with the Company.
- viii. Other purposes.** The Company may be required to use and retain the Client's personal information for loss prevention or to protect the Client's rights, privacy, safety, or property, or those of other persons in accordance with the Company's legitimate interests.

E. PERSONAL DATA – MARKETING OPT OUT

Octa Markets Cyprus Ltd uses Personal Data only as required to comply with regulatory requirements and/or provide quality service to its Clients. The Company will not rent, swap or sell the Client's personal information to other organisations for them to use in their own marketing activities without the Client's consent.

The Company may market additional products, services and promotions relevant to the Client and the products and services the Client requires if he/she has given consent to the Company to use data for such purposes. The processing of personal data may involve its transfer outside of the European Economic Area (EEA) to third countries where the level of protection of personal data is not as adequate as within the EEA.

The Company will ensure that the transfer of personal data to such third countries will only take place following the implementation of a transfer mechanism as prescribed in applicable legislation.

If the Client does not wish to receive marketing and/or promotional information of this nature for any reason, please contact the Company at the following address: dpo@octafx.eu Octa Markets Cyprus Ltd will still send important information to the Client about his/her account and the Company's service information.

F. PROTECTION OF PERSONAL DATA

Any personal information the Client provides to the Company will, subject to the Company's Terms of Service as this can be found to the Company's website, be treated as confidential and shared only within the Company and will not be disclosed to any third party except under any regulatory requirement, legal obligation or legitimate interests as described elsewhere within this Policy.

The personal information that the Client provides in connection with registering himself/herself as a Client of Octa Markets Cyprus Ltd is protected in many ways. The Client can access his/her trading account and profile through a password selected by him/her. This password is encrypted and known only to the Client and shall not be revealed to anyone else.

The Company has in place reasonable commercial standards of technology and operational security to provide protection for all information provided by users from loss, misuse, alteration or destruction. Further, the Company maintains physical, electronic and procedural safeguards that comply with applicable legal requirements and regulations to guard the Company's Clients' personal information and any other information, to ensure to the Company's Clients that their privacy is a major part of the Company's commitment to provide the finest services possible.

Registration information is safely stored on secure servers that only authorised personnel have access to via password. Octa Markets Cyprus Ltd encrypts all personal information and makes all necessary effort to prevent unauthorised parties from viewing any such information.

Employees are trained to respect the confidentiality of customer information and the privacy of individuals. The Company takes the safeguarding of Clients' data very seriously and will impose appropriate penalties, including dismissal where necessary for any breaches. The Company has appointed a Data Protection Officer (dpo@octafx.eu) to ensure that the Company's management of personal information is in accordance with this Privacy Policy and the applicable legislation.

G. CLIENT'S RIGHTS UNDER GDPR

The Client has certain rights under GDPR which are detailed below. Some only apply under specific circumstances and are qualified in several respects by exemptions in Data Protection Bill. The Company will advise the Client in response to his/her request if is relying on any such exemption. For any request, please contact the Company at dpo@octafx.eu. The Company will require the Client to prove his/her identity with two (2) pieces of approved identification to progress the request.

- i. **Access to Personal Data:** The Client has the right to request a copy of the personal information that the Company holds about him/her.

The Company will request such other relevant information that will reasonably assist it in fulfilling the Client's request. Information will be provided within one (1) calendar month of the request, unless the request is complex, in which case the Company may notify the Client that an extension of up to two (2) calendar months is necessary. A fee will not be charged for the first request but a reasonable fee to cover administrative cost of providing

further copies will be charged. If the request is unfounded or excessive, Octa Markets Cyprus Ltd has the right to refuse the request or charge a reasonable fee to deal with the request.

- ii. **Correction of Personal Data:** The Client may request from the Company to rectify and correct any Personal Data that the Company is processing about the Client which is incorrect. The Company will act within one (1) calendar month of request. The Company will independently verify the Client's identity before any information is changed.
- iii. **Right to withdraw consent:** Where Octa Markets Cyprus Ltd has a genuine, lawful and legitimate interest to collection, processing and storing of data, the Company is unable to withdraw consent. However, where the Company has relied upon the Client's consent to process Client's Personal Data, the Client has the right to withdraw that consent. To opt out of marketing (email or SMS), contact the Company at dpo@octafx.eu.
- iv. **Right of erasure/Right to be forgotten:** The Client may request from the Company to erase the Client's Personal Data where there is no compelling reason to continue processing. This right only applies in certain circumstances, it is not a guarantee or absolute right (for example, the Company may be required to retain the Client's data for legal and regulatory purposes which will take precedent).
- v. **Right to data portability:** This right allows the Client to obtain his/her Personal Data that the Client has provided to the Company with the Client's consent or which was necessary for the Company in order to provide the Client with its products and services in a format which enables the Client to transfer that Personal Data to another organisation. The Client may have the right to have the Personal Data transferred by the Company directly to the other organisation, if this is technically feasible.
- vi. **Right to restrict processing of Personal Data:** The Client has the right in certain circumstances to request that the Company suspends the processing of Personal Data. Where the Company suspends the processing of the Client's Personal Data the Company will still be permitted to store the Personal Data, but any other processing of this information will require the Client's consent, subject to certain exemptions.
- vii. **Right to object to processing of Personal Data:** The Client has the right to object to the use of this/her Personal Data which is processed on the basis of the Company's legitimate interests. However, the Company may continue to process the Client's Personal Data, despite his/her objection, where there are compelling legitimate grounds to do so or the Company needs to process the Personal Data in connection with any legal claims.
- viii. **Rights relating to automated decision making and profiling:** The Client has 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 him/her. This right means the Client may request that the Company involves one of its employees or representatives in the decision-making process. The Company is satisfied that it does not make automated decisions of this nature.

H. SHARING PERSONAL DATA

Having acquired the Client's consent, Octa Markets Cyprus Ltd may share information with Third Parties in the event such information is reasonably required or for legally or regulatory purposes in order to offer products and services that meet the Client's needs, and which are delivered in a manner that is useful and relevant.

Other Third Parties the Client's Personal Data may be shared with, may include, but are not limited to:

- an agent, professional advisor or service provider the Company engages to provide with administrative, marketing, financial, insurance, research and other services such as the Company's counter-party banks, liquidity providers, marketing agencies and IT service providers;
- organisations involved in a transfer or sale of the Company's assets or business;
- financial institutions involved in managing the Company's payments, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone whom the Client authorises the Company to disclose it to.

Octa Markets Cyprus Ltd will not disclose the Client's personal information to third parties outside of the EEA without ensuring:

- the Company has taken reasonable steps to ensure that the recipient has an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data;
- the recipient is subject to a similar information privacy regime, and
- only with the prior authorisation of the Data Protection Commissioner of the Republic of Cyprus.

Octa Markets Cyprus Ltd does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Policy.

Octa Markets Cyprus Ltd reserves the right to disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to its Clients.

To help the Company improve its services, Octa Markets Cyprus Ltd may engage third parties to help carry out certain internal functions. Use of shared information may also be used to provide professional, legal, or accounting advice to Octa Markets Cyprus Ltd.

All third parties with which Octa Markets Cyprus Ltd shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way Octa Markets Cyprus Ltd protects the same. Octa Markets Cyprus Ltd will not share personal information with third parties which it considers will not afford its Clients the required level of protection.

The Company shall not, share, disclose, engage and/or provide, from time to time, some and/or all of clients' personal information and/or data provided by its client(s) on an anonymous and/or aggregated basis only except where disclosure is made necessary, but not limited to, pursuant to a court decision or when disclosure of certain types of such information is required under the current applicable legislation, Regulatory and/or Supervisory Authorities within the Republic of Cyprus and/or for statistical purposes

and/or for improving the Company's marketing requirements, including submission for Regulatory inspection(s) purposes to the Company's Regulator (CySEC). The Company will only use information of a confidential nature and/or disclose the same to any person and/or organisation in the following circumstances:

- i. where the Company is required by law and/or if requested by any Regulatory Authority and/or Exchange having control and/or jurisdiction over the Company;
- ii. in order to investigate and/or prevent fraud and/or other illegal activity in accordance with the applicable Laws within the Republic of Cyprus;
- iii. to any third party only in connection with the provision(s) of services and/or products offered and/or provided to the client by the Company;
- iv. in accordance with the ancillary services provided to and/or the administration of the clients' account, including, without limitation, for the purposes of credit and/or identification enquiries and/or assessments;
- v. if it is in the public interest to disclose such information; and/or
- vi. at the clients' written request and/or with the clients written consent.

The Company's Clients agree and consent for the use of the initial information/data provided by the Client, for the initial account opening and/or establishment of a business relationship with the Company and when the Client wishes and/or files an additional request and/or amendment(s), alteration(s) and/or service(s) in relation to account and/or services and products provided by the Company, provided that the initial KYC (Know Your Customer) documentation supplied initially by the Client is still up to date and/or comply with all legal requirements of the KYC documentation, policies, procedures and Manuals of the Company.

I. REGULATORY DISCLOSURE

Octa Markets Cyprus Ltd reserves the right to disclose Personal Data to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect its rights and / or comply with such legal proceedings. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, Octa Markets Cyprus Ltd shall expressly inform the third part regarding the confidential nature of the information.

Octa Markets Cyprus Ltd, as a regulated firm, is required to comply with certain obligations under the Intergovernmental Agreement with the United States and has taken all reasonable steps to be considered in compliance with the Foreign Account Tax Compliance Act ("FATCA") and the Common Reporting Standard ("CRS"), approved by the Organisation for Economic Co-operation and Development ("OECD") for the exchange of information for tax purposes.

J. DATA RETENTION

Octa Markets Cyprus Ltd is legally obligated to keep the Client's Personal Data provided, including but not limited to his/her name, address, email, phone number, his/her trading and transaction history, deposits and withdrawals history, for at least 5 (five) years after the business relationship has terminated.

The Company will hold the Client's Personal Data for the longest of the following periods:

- i. the period required for the performance of the relevant activity or services,
- ii. any retention period required by law,
- iii. the end of the period of any litigation and/or investigation by a public authority which arises in respect of the relevant activity and/or the services, or
- iv. where the Company has justifiable legitimate interest.

Kindly note that data protection terms will be included in the Client Agreement as this can be found to the Company's website, for the establishment of a business relationship between the Company and its Clients. Any Personal Data collected will be retained for carrying out the establishment of the business relationship.

If the Company holds 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 (5) or ten (10) years after the business relationship has terminated.

Restriction & Limitation of Liability

The Company and/or its employees shall not be held liable for any loss(es) and/or damage(s) including without limitation, indirect and/or consequential loss (es) and/or damage (s) arising from loss (es) of data and/or profit(s) arising out of and/or in connection with, the use of this website. The material and/or information contained on this website is solely for information purposes only. Material and/or information on the Company's website, including, but not limited to, images, texts, policies, forms, agreements is owned and/or otherwise provided by the Company; should not be reproduced, and/or distributed and/or published in whole and/or in part for any purpose without the explicit written consent and/or permission of the Company. The material and/or information within the Company's website should not be interpreted and/or comprehended as an offer and/or a solicitation of an offer, to investment services/activities and/or any financial instruments.

The Company takes no responsibility for, and should not be liable for, the Company's website being temporarily unavailable due to technical issues beyond the Company's control nor shall accept any liability for loss(es) and/or damage(s) as a result of reliance on the information contained within the Company's website. Further, the Company is not liable for the privacy policies or the content of sites to which links are available and has no control of the use or protection of information provided by the Clients or collected by those sites. Whenever a Client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

The Company's website may be accessed within the European Union, however the financial products mentioned on the Company's website may not be allowed by law to all investors in all European countries. The access to the Company's website may be restricted to certain jurisdictions due to domestic legal restrictions. For such visitors and were users of the Company's website subject to such legal restrictions are not allowed to access it, the Company bears no responsibility as well as to visitors or users or towards any individual who may access the Company's website illegally.

The Company's website is not intended to constitute legal, investment, consulting, or other professional advice or services. The Client, before making any decision or taking any action that might affect his/her personal situation and/or business, should consult a qualified professional advisor.

Use of "Cookies"

The Company's website, www.octafx.eu, and application form uses cookies to distinguish its Clients from other users of the Company's website. This helps the Company to provide the Client with a good experience when browsing the Company's website and allows the Company to improve its website. By continuing to browse the website, the Client agrees to the Company's use of cookies.

The Company utilizes "cookies" to identify users when they connect to the website and to enhance the performance of the website. A cookie is a small piece of data that the Company stores on the Client's browser or the hard drive of his/her computer if the Client has enabled the relevant functionality from his/her browser to accept cookies. Cookies contain information that is transferred to the Client's computer's hard drive. Cookies used by the Company do not contain personal information or other sensitive information. When a current or prospective Client accesses the Company's website a cookie is created and placed on the user's machine. In addition to information related to authentication, information may be stored in the cookie in order to direct a user to the correct site location.

The Company may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. This assists the Company to provide the Client with a good experience when he/she browse the Company's website and also allows to the improvement of the website. By continuing to browse the website, the Client agrees to the Company's use of cookies. To administer and improve the website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Octa Markets Cyprus Ltd uses the following cookies:

- **Strictly necessary cookies.** These are cookies that are required of the operation of the Company's website/web portal. They include, for example, cookies that enable the Client to log into the secure areas of our website/web portal.
- **Analytical/performance cookies.** They allow the Company to recognise and count the number of visitors and to see how visitors move around the Company's website and Platform when they are using them as well as information of the Internet browsers and operating systems used, the domain name of the website previously visited and pages viewed. This helps the Company to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily. The performance cookies collect information that cannot personally identify the Client and only collect aggregated and anonymous information. The Client can control and/or delete these cookies as well as all cookies that are already on the his/her computer and/or device, however if he/she decide to delete them, some features of the Company's website and/or Platform may not work as expected.

- **Functionality cookies.** These are used to recognise the Client when he/she returns to the Company's website. This enables the Company to personalise the Company's content for the Client, greet him/her by name and remember his/her preferences.
- **Web tracking technologies.** The Company uses third party analytics, such as Google Analytics, an analytics service provided by Google, to monitor the Google AdWords, the performance of the website and Platform for optimisation purposes and to monitor the performance of specific functionalities. These technologies collect information including the Clients' IP address, information of the browser Clients use, device and software identifiers, referring and exit URLs, onsite behavior and usage information, media access control address, mobile unique device identifiers and other similar information via the use of cookies, which are stored by Google to their servers. Google may transfer this information to third parties, if required to do so by the law or where this information are process on behalf of Google by third parties.

For more information about Google Analytics please visit the following page:

<https://support.google.com/analytics/answer/6004245?hl=en>

Enable and/or Disable Cookies

Should the Client wish to enable or disable cookies the following instructions should be adhered to. It should be noted that in the cases where the Client wishes to disable cookies, certain sections of the Company's website might not work properly, and he/she may face difficulties logging-in or reviewing articles.

How the Client may enable and/or disable cookies using his/her browser

a. Microsoft Internet Explorer 6.0, 7.0, 8.0

- Click on 'Tools' at the top of his/her browser window and select 'Internet Options';
- In the options window navigate to the 'Privacy' tab;
- To enable cookies: Set the slider to 'Medium' or below;
- To disable cookies: Move the slider to the top to block all cookies;
- Note: there are various levels of cookie enablement and disablement in Explorer. For more information on other cookie settings offered in Internet Explorer, please look for a "help" function in the browser or contact the browser provider.

b. Google Chrome

- Click the wrench icon on the browser toolbar;
- Select Settings;
- Click 'Show advanced settings';
- In the "Privacy" section, click the 'Content settings' button;
- To enable cookies in the "Cookies" section, pick 'Allow local data to be set', this will enable both first-party and third-party cookies. To allow only first-party cookies pick 'Block all third-party cookies without exception';

- To disable cookies, in the “Cookies” section, pick ‘Block sites from setting any data’;
- **Note:** there are various levels of cookie enablement and disablement in Chrome. For more information on other cookie settings offered in Chrome, please look for a “help” function in the browser or contact the browser provider.

c. Google Chrome Mozilla Firefox

- Click on ‘Tools’ at the browser menu and select ‘Options’;
- Select the Privacy panel;
- To enable cookies: Check ‘Accept cookies for sites’;
- To disable cookies: Uncheck ‘Accept cookies for sites’;
- **Note:** there are various levels of cookie enablement and disablement in Firefox. For more information, refer to the following page from Mozilla, please look for a “help” function in the browser or contact the browser provider.

d. Other Browsers

- Please look for a “help” function in the browser or contact the browser provider.

K. PRIVACY STATEMENT UPDATES

From time to time, Octa Markets Cyprus Ltd may update this Privacy Policy. In the event Octa Markets Cyprus Ltd materially changes the Privacy Policy, including how we collect, process or use the Client’s Personal Data, the revised Privacy Policy will be posted on the website keeping the Client informed. Octa Markets Cyprus Ltd encourages Clients to periodically check back and review the Privacy Policy so that the Client always will know what information Octa Markets Cyprus Ltd collects, how it used and to whom it may be disclosed to.

L. COMPLAINTS

If the Client thinks that the Company is using Client’s information in a way which breaches data protection law, the Client has the right to lodge a complaint with the Company’s national data protection supervisory authority and contact the Commissioner for Personal Data Protection, at commissioner@dataprotection.gov.cy.

For any queries or further information in relation to the Company’s Privacy Policy, please contact our Company at compliance@octafx.eu and/or dpo@octafx.eu.

M. APPENDICES

Appendix 1 - Declaration of Consent

Declaration of Consent - General Data Protection Regulation (“GDPR”)

I hereby provide my explicit consent to the collection, usage, transmission, storage or processing of my Personal Data by **Octa Markets Cyprus Limited** (“the Company”) and/or its authorized representatives solely within the context of the business relationship and the fulfilment of our contractual obligations and the regulations and policies of **Octa Markets Cyprus Limited**, in accordance with the provisions of the General Data Protection Regulation (GDPR) (EU) 2016/679 and Law 125(I)/2018 and any amendments thereto.

☐ I consent ☐ I **do not** consent

Appendix 2 - Complaints Form – Personal Data Protection**COMPLAINTS FORM - PERSONAL DATA PROTECTION****Date of Submission:****Reference Number:****a. Client Information:**

Name:

Surname:

Account Number:

Trading Platform:

b. Contact Details of the Client:

Postal Address:

City:

Country:

Telephone Number:

Email address:

c. Complaint details:

Complaint Type (Specify the Personal Data breach):

Date when the actual Complaint incurred:

Time Zone:

Employee / Department who offered the services to the Client:

Description of the Complaint:

FOR OFFICIAL USE ONLY

Received on:

Received by:

Resolution assigned to:

Deadline for reply: