

Privacy and Cookie Policy

Colmex Pro Limited (or "we", "us", "Colmex Pro", "the Company") is Cyprus Firm which provides investment services to its clients. The Company must possess personal data (including sensitive personal data) so that it can provide these services. The Company is proud in maintaining strong and professional relationships with our clients and other stakeholders ("the data subject" or "you"). Hence, we put emphasis in respecting and supporting each person's right to privacy.

This Privacy Policy ("the Policy") applies to personally identifiable information that we collect and process through our website, www.colmexpro.com, as well as any other related sites and applications (if applicable). This Policy does not apply to websites operated by other organizations and/or other third parties. The Policy also applies to personal information that we collect and process when you use or interact with our services through any correspondence made with us by e-mail, phone or otherwise. The Policy aims to inform you about the type of information we gather, who we share it with, what we use it for, and how we keep it secured.

When using any of our Services, you consent to the collection, transfer, storage, disclosure, and use of your personal information subject to this Privacy Policy.

What personal information does Colmex Pro process and why?

When you apply for or maintain a trading account with Colmex Pro, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you and providing customer service.

It also includes information such as follow:

- Identifying information: ID, full name, date of birth, occupation, age, any photographs included in your identity verification documentation, marital status, criminal records, CV;
- Contact details: email address, phone numbers, work address;
- Proof of residence: in the form of utility bill dated within the last 6 months, driving license etc.
- Signature
- Records of our communications with you. We may record any communications, electronic or by telephone or otherwise, that we may have with you in relation to the services we provide and/or govern our business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between the Company and the data subjects. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.
- Information we may have obtained from other sources such as data sources or service providers in order to identify our client due to KYC requirements as required by relevant legislation;
- Proof of payment/deposit: copies of your credit card with only the last 4 digits shown if paid by card, copies of bank statement if payment was done by wire transfer;
- Financial Information, i.e. estimated annual income, net worth, liquid assets, previous trading experience, risk tolerance.

- information from which they can be identified such as the times they log on (for instance, IP address, type of computer or telecommunication device used for accessing our corporate website, geographical Location and Internet Access Service Provider of an individual visitor) their volume of use of our corporate website, the types of data, systems and reports they access, duration of sessions and other similar data.
- Tax Identification Number;

This information is collected when you:

- Register for an account with the Company and/or interested to know about our products and services
- Apply for our products and/or services
- Provide us with the information necessary to verify your identity
- Give us some feedback
- Examples also include background information we may receive about you from public records or from other entities for Know Your Customer (or “KYC”) purposes.

We will use the information you provide us to:

- verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, “know your client”, and anti-money laundering;
- contact you on matters related to your account, including without limitation, to request any additional information and/or documentation;
- tailor the products and services offered to you;
- assess whether you qualify as a client;
- maintain administrative records relating to our business according to applicable laws;
- provide you with notices related to your account, general updates, market updates and other marketing materials, including without limitation, the services and products offered by us and related third parties;
- for other legitimate or lawful purposes

Sharing personal information with external parties

Third party disclosures may include sharing such information with our group companies, affiliates or non-affiliated companies that perform data processing and support services for your account or facilitate your transactions with Colmex Pro, including those that provide professional, legal, technological, processing payments or accounting services to Colmex Pro. Third parties are required to maintain the confidentiality of such information and to use your personal information for the purposes that Colmex Pro dictates and within the ambit of the applicable laws.

Also, we may share personal information with any competent law enforcement body, regulatory, government agency, court or other third party where such disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or (iii) to protect your vital interests or those of any other person.

Our legal basis for using your personal information

Entering into and performing the contract with you: If you have a Colmex Pro trading account or have registered to the website or have applied for our services, our legal basis for processing your personal information is that it is necessary for the performance of Colmex Pro terms and conditions, and to provide our services to you. With respect to a trading Colmex Pro account, this includes facilitating access to our platform, processing payments and executing trades.

For other justifiable grounds, including legal obligation and legitimate interests:

We process your personal information, necessary for us to comply with our legal and regulatory obligations, and also where it is necessary, for legitimate interests we have in conducting our business. These include without limitation:

- Learning about your interests and preferences in order to contact you with information that is relevant to you and helping us maintain promotional communications with you.
- Analyzing and continually improving the website and our services and helping us pilot test versions of the website internally to develop new features and ensure the efficient running of Colmex pro services.
- Detecting and reducing fraud and credit risk.

Your rights under the General Data Protection Regulation (GDPR)

Data subjects, according to their place of residence, in EU and/or other regions, are *inter alia* entitled:

- to be informed about the personal data that the Company processes on you
- to access and review their personal information and in some circumstances to obtain a copy of the personal information in machine readable format (right to access),
- to request that their personal information is erased and we will comply, unless there is a lawful reason for not doing so (right to erasure or right to be forgotten),
- to opt-out of marketing communications, you can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you (right to erasure or right to be forgotten),
- for the processing of their personal information to be restricted (right to restriction of processing),
- that any inaccurate personal information is corrected (right to rectification)
- to object to the processing of their personal information (right to object),
- to object to have your personal information disclosed to our affiliates or other third parties, as described in this Policy (right to object),
- to request for your data which has been collected and/or processed by Colmex Pro to be transferred to another service provider (right to data portability).
- The right not to be subjected to automated decision making and profiling.
- The right to withdraw consent at any time (if the process based on the consent).

Any such requests to exercise your rights under GDPR (“request”) should be submitted in writing to: dpo@colmexpro.com. If you make a request, we have 1 (one) month to respond to you, unless the request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated. Individuals also have the

right to complain about the use of their personal information to the Supervisory Authority which in Cyprus is the Office of the Commissioner for Personal Data Protection. For more detailed information please refer to the following website: <http://www.dataprotection.gov.cy>.

Use of Cookies:

Cookies are tiny pieces of data that are sent to your computer by a website and stored on your computer. Cookies are non-executable and cannot be used to install malware. They allow websites to recognize visitors when they return and include basic information about them that is checked and updated every time you visit the website.

Some of the cookies that Colmex Pro sets when you visit any of our websites are essential to the working functionality of the website.

Performance cookies are another type of cookies used to provide with you a better user experience and to improve how content on our website is presented.

Marketing cookies are also set usually by third party advertising networks, to ensure we are providing you with targeted adverts more relevant to you and your interests. If you do not want to receive non-mandatory cookies, you can manage your preferences. If you use our web services without blocking cookies, you are actually consenting to the cookies.

If you don't want to receive cookies, you can modify your browser to refuse cookies altogether, or to simply notify you when cookies are sent. You can also delete cookies that have already been sent. You can do this by modifying your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit <http://www.aboutcookies.org>, which contains comprehensive information on how to manage cookies on a wide variety of desktop browsers.

How does Colmex Pro keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In particular, we:

- Hold personal information in secure facilities and where the information is held electronically, on secured servers.
- Use encrypted transmission links whenever we can.
- Use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control access to systems and data.

Retention of personal information

The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. The retention of your personal information will be subject to periodic review. We may keep an anonymized form of your personal information, which will no longer refer to you without time limits, to the extent that we have a legitimate and lawful interest in doing so.

If you have a trading account with Colmex Pro, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by applicable laws and regulations.

Minors

Our services are not available for users under the age of 18 (a “minor”). We do not knowingly collect personal information from or about minors. If you are a minor, you should not download or attempt to use any of our services nor provide any personal information to us.

If we become aware that a minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at dpo@colmexpro.com.

Personal Data transfers

Subject to certain conditions, we may transfer your personal information to a third party in countries outside the EEA for further processing, in accordance with the purposes set out in this Privacy Policy. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organization, contractual or other lawful means.

Changes to this Privacy Policy

The Policy will be reviewed from time to time, in order to take account of changes to our operations or practices and to make sure it remains appropriate to any changes in law, technology and/or the business environment. Any personal information held, will be governed by our most current Policy. The updated Privacy Policy will be posted in the Company’s operated website, www.colmexpro.com and the client accepts posting the update as official notice to the client.

HOW TO CONTACT US

Questions, comments, complaints and requests regarding your data or this privacy policy are welcomed and should be addressed to us at dpo@colmexpro.com.

When using any of our services you consent to the collection, transfer, storage, disclosure, and use of your personal information subject to this Privacy Policy.