

Updated
Privacy Policy

to comply with GDPR
(European Regulation (EU) 2016/679)

In *ZuluTrade* we understand clients' data privacy concern and value the trust they place in us. In view of the European 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 (GDPR), "*ZuluTrade*" and its affiliated companies, including its subsidiaries, branches, representative offices, directors, officers and employees ("we" or "us") takes every reasonable step to comply therewith. We are committed to maintain the highest level of protection when processing our clients' personal data; for purposes of transparency, please find hereunder some useful information on our company's data protection policy.

1. Information we hold and why:

- 1.1.«*ZuluTrade*» Greek office address: 14 Akti Kondyli, Piraeus, 18545, Greece, tel: 0030-21301763 is construed as data controller within the meaning of the GDPR; we collect for the performance of the contract the following information in compliance with legal and regulatory requirements: Name; email address; permanent address; date of birth and other information contained in passports and ID cards; VAT number; credit card or banking data; information about financial and work status. We use this information to conclude transactions and execute orders on behalf of our customers, provide customer support and comply with legal obligations (i.e. AML/KYC obligations).
- 1.2.Pursuant to our internal operations and with view to enhance customer experience, we collect additionally the following information that is obtained in the ordinary course of our business relationship with clients: usernames and passwords; transaction record; account balances; trading activities or any communications with us; information gathered by the use of cookies; online identifiers including IP address; log files; location data; device type or language or browser settings etc.
- 1.3.We also use email addresses – subject to our clients' consent - to better market and advertise [*"ZuluTrade"*]'s services.
- 1.4.In case where any client wishes to create an Islamic account, he/she explicitly consents to the processing of his/her personal data referred to religious beliefs.

2. Profiling and automated decision-taking

In compliance with the current legal framework governing investment and financial services (including MIFID2), « *ZuluTrade* » creates investor profiles for each of its clients. Such profile is necessary for assessing the risk profile of each client and is required by law.

3. Sharing your contact data (recipients & outside EEA)

- 3.1.Our clients' personal data may be shared with other affiliated companies (e.g. subsidiaries) within our Group. We also share our clients' personal data with the following categories of third parties:
 - Banks, payment processors and e-wallets for the provision of financial services. In order to provide financial services and in connection with our everyday business purposes and

activities, we may share clients' personal information with those third parties who perform services on our behalf.

- Competent local and European supervisory and judicial authorities, such as Financial Supervisory Authorities and Tax Authorities, for the purposes of ensuring legal and regulatory compliance.
- « *ZuluTrade* » uses certain trusted third parties to help us provide, improve, protect, and promote our Services. These third parties will access your information only to perform tasks on our behalf and in compliance with the European legal framework on the protection of personal data.

In addition to the parties listed above, we may disclose data concerning our clients when it is necessary to satisfy any applicable law, regulation, legal process, or governmental request.

4. International transfers of personal data

In the context of our daily business activity, we may use resources and servers located in various countries around the world for the provision of financial services, and therefore clients' personal data may be transferred across international borders outside the European Economic Area (EEA). In such cases we take all reasonable precautions to apply the appropriate or suitable safeguards set forth by the GDPR, for example, by transferring data to countries that have been assessed by the EU Commission as ensuring an adequate level of protection or lack thereof, by adopting standard contractual clauses approved by the EU Commission. You will be promptly informed and in detail of our Company's recipients located outside EEA.

5. Data retention period

« *ZuluTrade* » stores personal data for as long as it is necessary for regulatory compliance and for the period required for the establishment, exercise or defense of legal claims.

6. Data subject rights

Clients are entitled to exercise the following rights in accordance with the GDPR:

- a) The right to access the personal information concerning them, to correct or rectify inaccurate information and, when applicable, to object to data processing;
- b) the right of erasure of those data that either have been collected solely based on clients' consent, or they are no longer needed to perform the purpose(s) for which they were collected;
- c) the right to restrict processing when such data are no longer needed to perform the purpose(s) for which they were collected;
- d) the right to have personal information provided in a structured, commonly used and machine-readable format;

- e) the right to withdraw consent at any time and without any detriment, insofar as personal data processing is based exclusively on clients' consent, including the request to stop receiving via email marketing communications from « *ZuluTrade* »; you can revoke your consent at any time by selecting your preferences from your account area dedicated tab by clicking on the check boxes you can find on the Personal Details - Notifications section of your ZuluTrade account. You can always click on the unsubscribe option placed at the bottom of each such email received.
- f) The right to lodge a complaint with the Hellenic Data Protection Authority in case where clients consider that the processing of their personal data infringes the GDPR.

7. Updates-contact person

More information on our updated Data Protection Policy shall be provided promptly. For any information or request on your personal data, you may contact support@zulustrade.com