

Privacy Policy

V1.1

This Policy sets forth Brokereo.com ("we", "our" or "us") practices with respect to information collected from users who access the website at www.brokereo.com ("the Website"), register or perform transactions ("you" or "your").

This Policy forms an integral part of our Terms and Conditions and is incorporated therein by reference.

We encourage you to carefully read the Policy and use it to conclude informed decisions.

The protection of privacy and the safeguarding of your personal and financial information is our responsibility and one of its highest priority. By opening a trading account with us, you hereby give your consent to such collection, processing, storage and use of personal information as explained below.

Collection of personal information

We collect the necessary information required to open your trading account, perform transactions and safeguard your assets, privacy and to provide you with the services you require. In this respect, we collect data and information from you and/or other sources which will help us to construct your profile based on their requirements and preferences in order to provide its services effectively).

The first type of information is un-identified and non-identifiable information pertaining to a client(s), which may be made available or gathered via your use of the Website ("Non-personal Information"), even if you do not participate or register on the Website. We are not aware of the identity of a person from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of the Website. We may also collect information on your activity on the Website (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable efforts identify an individual ("**Personal Information**"). Such information includes:

- Registration information: When you register for an account (including demo accounts), webinar, provide
 information when participating in a webinar or subscribe to our newsletter, you may be asked to provide us
 certain details such as: full name, e-mail address, date of birth, residential address, phone number, and other
 information, as described in our Terms and Conditions and Account Opening Questionnaire.
- We may also receive information from our network of business partners which provide us with promotional and advertising services.
- Device Information: We may also collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information regarding your activity in relation to the Website.
- Authentication Data (e-signature and/or signature).
- Any communication with the client including electronic and/or telephone communication and/or in person or otherwise.
- Payment Information: In order to process deposits, execute withdrawals and for anti-money laundering purposes, you may be required to provide personal information within the Website or with our payment processor(s). Such personal information may include your name, billing address, identity number, financial information (e.g. your credit card number, bank account owner and number, etc.) and any other information that is required in order to perform transactions in question.

Use of personal information

We use your personal information as required to provide services to you, in line with the provisions of our Terms and Conditions and in order to comply with our obligations emanating from the relevant applicable regulations and legislation. This information also helps us to improve our services, customize browsing experience and enables us to inform you about additional products, services or promotions available to you and in this respect you hereby consent to the usage of this data for such purposes.

If you do not want to receive information of this nature for any reason, you can contact us at: support@brokereo.com

User Rights (For EU Users)

You may request to:

- 1. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
- Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
- 3. Request rectification of your personal information that is in our control.
- 4. Request erasure of your personal information.
- 5. Object to the processing of personal information by us.
- 6. Request to restrict processing of your personal information by us.
- 7. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be a subject to the applicable regulatory and legal requirements and obligations, as well as to our own legitimate interests.

How to exercise your rights?

Please follow the procedure and proceed by submitting a request to exercise your rights or to submit a complaint in relation to your personal data that were collected from you to dpo@brokereo.com from the email address you have registered with us providing the following details:

- 1. Your personal details:
 - Name and surname;
 - o Trading account number;
 - Email address.
- 2. Details of your request, including all documentation supporting your request.
- 3. A declaration under penalty of perjury that the information you have provided is true and accurate (your request must include this language).

In case you are represented by a third party, a legitimate mandate has to be established. Please note that you are required to provide us with a Power of Attorney authorising your representative to act on your behalf. The necessary information that shall be included and accompany the Power of Attorney are the following:

- Identity of your representative (i.e. Proof of Identity, Proof of Residence);
- Description of your relationship to the representative;
- Email address;
- Contact number.

Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing your personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

Protection of personal information

Any personal information provided by you to us will be treated as confidential and shared only within our organisation, our affiliates and/or business partners solely for the purposes of the provision of services to you, as per our Terms and Conditions, and it will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any competent authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the competent authority. Under such circumstances, we shall expressly inform the third party regarding the confidential nature of the information.

Transfer of data outside the EEA

Please note that some data recipients may be located outside the EEA (European Economic Area). In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

Corporate transaction

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Policy.

Minors

We forbid users under 18 years of age to register or trade using our services. If we become aware that a user under the legal age has shared any information, we may discard such information. If have any reason to believe that a person under 18 years of age has shared any information with us, please contact us at support@brokereo.com

Affiliates and Partners

We may share information with affiliates and/or other business partners in the event such information is reasonably required by such affiliate and/or business partner in order to provide the products or services to you. We may share information with partners, affiliates and associates in order to offer additional similar products and services that meet your needs, and which are delivered in a manner that is useful and relevant only where you have authorised us to do so.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

Non-affiliated third parties

We do not sell, license, lease or otherwise disclose your personal information to third parties, except as described in this Policy.

We reserve the right to disclose personal information to third parties where required by law, regulatory and other government authority. We may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to you.

In addition, we may engage third parties to help carry out certain internal functions such as account processing, client service, client satisfaction surveys or other data collection activities relevant to the business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which we share personal information are required to protect such personal information in accordance with

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all relevant legislation and in a manner similar to the way we protect the same. We will not share personal information with third parties which we consider will not provide you the required level of protection.

Contact

From time to time we may contact you by phone or email for the purpose of offering you further information about trading in contract for differences. In addition, we may, on occasion, seek to contact you or prospective clients, whether by phone or by email, for the purpose of providing information about unique promotional offerings provided by us. You consent to the receive such contact when you agree to our terms and conditions when registering with us. Any person wishing to opt out of further contact with us is entitled to do so at any given time by contacting us by email at: support@brokereo.com and requesting either to be contacted only in certain form or not to be contacted at all.

Markets

In cases where clients have been introduced by our business introducer or any other associate, such business introducer and/or associate may have access to your information. Hence, you hereby consent to the sharing of information with such persons.

Restriction of responsibility

We are not responsible for the privacy policies or the content of websites to which the Website is linked or may be linked and over which we have no control of use or protection of information provided by you or collected by those websites. Whenever you elect to link to a co-branded website or to a linked website, you 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 policies of that third party.

Use of "COOKIES"

We use cookies to secure your trading activities and to enhance the performance of the website. Please refer to our <u>Cookies Policy</u> for more information.

Privacy Policy Updates

We may update this Policy from time to time. In the event that we materially change this Policy including how it collects, processes or uses your personal information, the revised Privacy Policy will be uploaded to the Website. In this respect, you hereby agree to accept posting of a revised Privacy Policy electronically on the Website as the actual notice from us to you. Any dispute over our Privacy Policy is subject to this notice and our Terms and Conditions. Your continued use of the Website or services, following the notification of such amendments on the Website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.