Privacy Policy

At Quadcode Markets, we are committed to protecting and respecting your privacy. This privacy policy provides information on how we as *"data controllers"* collect, process and share your personal data, i.e., information about a Client (as defined below) who is a natural person on the basis of which that Client can be identified (hereinafter the "**data"**) in accordance with applicable data and/or privacy protection legislation, including the EU Regulation No. 2016/679 the General Data Protection Regulation (hereinafter "**GDPR"**) if you visit our website, quadcodemarkets.com (**Website**).

We strive to create the most secure infrastructure of any broker in the world. In this privacy policy, we would like to tell why you can trust us with your data and rest assured that your data is safe.

By submitting your details, registering for a Client's Account, you accept the terms and conditions of this policy and consent to the collection, processing and/or storage of your data by us. It is important that you read this Privacy Policy together with any other privacy notice and/or policy we may provide you from time to time. We may amend this Privacy Policy from time to time, therefore please visit the Website to remain updated as the new version of the policy will be posted and made available here.

Please note that this Privacy Policy is addressed to Clients and potential customers. If you are an employee, a contractor or a third-party service provider of Quadcode Markets, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us at the contact details listed in the section OUR CONTACT DETAILS below.

1. WHO WE ARE

Quadcode Markets, is the registered trade name of IQOPTION EUROPE LTD, a company registered in the Republic of Cyprus with company registration number HE327751, having its registered address at 82nd road, 4 Kato Polemidia, 4153, Limassol, Cyprus, which is a Cyprus investment firm with license no. 247/14 that is authorized and regulated by the Cyprus Securities and Exchange Commission (hereinafter "**Quadcode Markets**"). We are the controller and responsible for the data of the client disclosed to us in order to register for a Trading Account, Demo Account and/or to make use of any other services offered through the Website (this term shall at all times include the Website's desktop and mobile versions).

This Privacy Policy is issued on behalf of Quadcode Markets, so when we mention “QUADCODE MARKETS”, “Company”, “we”, “us” or “our” in this Privacy Policy, the entity responsible for collecting and/or processing your data when you use the Trading Platform through the Website, either for a Trading Account or a Demo Account (or their mobile/desktop versions) (hereinafter the “**Service(s)”**). We respect your privacy, and we are committed to protecting your data, which it collects, uses and/or has access to.

We take measures to implement advanced data protection policies and procedures and to update them from time to time for the purpose of safeguarding the Client's data and the Client’s account. Your data is protected by the legal, administrative and technical measures that we take to ensure the privacy, integrity, and accessibility of data. To prevent security incidents with your data, we use a mixed organizational and technical approach based on the results of our annual risk assessment.

We shall not divulge any private information of our Clients and/or former Clients unless provided hereunder or the Client approves so in writing or unless such disclosure is required under applicable law or is required in order to verify the Client's identity, or it is required for us to perform our contractual obligations under any agreement concluded with the Client. The Clients' information is processed only by our employees and/or trusted third parties which provide specific support services, dealing with the specific Client's Account and necessary for the provision of our Services. All such information shall be stored on electronic and physical storage media according to applicable law.

2. DATA COLLECTED, REASONS AND USAGE

1. We may collect, use, store and transfer different kinds of data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, and patronymic (if available), date of birth, gender, passport, ID, Driver’s number, and copy of photo.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about the transactions performed by you, details about payments, withdrawals, exchanges, trading history, profit, balance, deposit and withdrawal amount and methods, and any other details in relation to the services you have made use of through our Website.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in type and versions, operating system and platform, and other technologies on the devices you use to access the Website and use of cookies stored on your device.

- **Profile Data** includes your Client's account details, username and password, transactions made by you, your interests, preferences, feedback and/or information received through your interaction with us within the course of providing our services and survey responses.
- **Usage Data** includes information about how you use the Website, products and services, registration date, account category, trading cluster, number of complaints, number of requests filed and IP history.
- **Marketing and Communication Data** includes your preferences in receiving marketing from us and your communication preferences.

- **Special Categories of Data/ 'Sensitive' Data** includes details about your religious, annual income, biometric data, and/or criminal convictions and offenses.
- **Conformity Data** includes details about your education, employment status, trading experience, self-assessment test.
- **Banking Data** includes details of the number of payment wallets and/or information of your bank card, including information of the issuing bank, card number, cardholder name, card expiration date, payment system, card validation code (CVV2 / CVC2), and photos of both sides of the bank card.
- **Data in KYC (Know your customer)** includes identity document information, including copies of recently dated Utility Bills, Identity Card, Passport and/or Driver's License, Tax Identification Numbers (TIN).
- **Economic Profile Data** includes details on annual income, net profit, expected annual amount of investment, sources of funds.
- **Location Data** includes details on your actual location when interacting with our Website (for example, a set of parameters that determine regional settings of your interface, namely residency country, time zone, and the interface language)
- **Audio Data** includes full voice recordings of calls that you receive from us or make to us.

  (the above collectively referred to as "**Personal Data**")

2. Aggregated Data includes statistical or demographic data for any purpose. Such data can be derived from your data but may not be considered personal data in law as it will not directly or indirectly reveal your identity. An example of such Aggregated Data could be that we aggregate your Usage Data to calculate the percentage of users accessing a specific website feature and/or services/product preference. Notwithstanding the above, if we combine Aggregate Data with data in a way that the end result can in any way identify the data subject, we shall treat such combined data as data which will be treated as per the provisions herein contained.3. Processing of your data is carried out by us following the principles of lawfulness, fairness,

transparency, and always adhering to the intended purpose of data processing, the principle of data minimization, accuracy, limited data storage, data integrity, confidentiality, and accountability.

In general, we collect and process the Personal Data, for any of the following reasons:

1. To perform your contractual obligations towards you,
2. To comply with our legal and regulatory obligations, including inter alia, to the Markets in Financial Instruments Directive (2014/65/EU) (MiFID II) as amended from time to time, and to prevent fraud and money laundering acts pursuant to the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007, No. 188(I)/2007, as amended from time to time (hereby referred to as MiFID Law)
3. To safeguard our legitimate interests and your interests and fundamental rights do not override those interests.

The Client acknowledges that all or part of the data concerning the Client's account and related transactions will be stored by us and may be used by us in case of dispute between us and the Client.

The Client is responsible for updating any data provided to us in case of any change. Although we will strive to keep your data up to date and review and inspect any information provided by you, we may not be able to always do so without your help. The Client acknowledges that we hold neither commitment nor responsibility to the Client due to any aforesaid review or inspection of information.

3. HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you, including through:

Direct Interactions. You will provide to us your Identity, Contact and Financial Data and other Personal Data online through the Website and/or by registering online for a Trading Account and/or by corresponding with us by emails or otherwise. Data may be submitted to us by you when you wish to:

A. Register for a Trading Account;
B. Register for a Demo Account;
C. Subscribe to our publications and ongoing updates;
D. Request marketing and promotions to be sent to you;
E. Enter a competition, promotion, or survey;
F. Give us feedback or subscribe or request to receive notifications for new products, features and/or updates; and/or G. Contact us for any request.

We require collecting the above data in order to be able to (i) provide our services efficiently, (ii) to comply with our ongoing legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/or (b) conduct the assessment of suitability and appropriateness test.

If you fail to provide the data when requested, we may not be able to perform the contract we have or try to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time. It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during your relationship with us.

Automated Technologies or Interactions. When using our Services or visiting the Website, your device automatically transmits to us its technical characteristics. Locale (a set of parameters that determine regional settings of your interface, namely, residence country, time zone and the interface language) is used for the purpose of providing you with the best possible service within our platform. Using the information about IP address, cookies files, information about browser and operating system used, the date and time of access to the site, and the requested pages addresses allows us to provide you with the optimal operation on our web application, mobile and/or desktop versions of our application and monitor your behavior for the purpose of improving the efficiency and usability of our Services.

We use web analytics tools to track the performance of our Website and marketing source of users by cookies in order to optimize our marketing costs and provide users with a better experience.

You may at any time request that we refrain from any such transmissions (to the degree this is possible and subject to any of our legal obligations) by sending your request to the DPO using our details in the Section OUR CONTACT DETAILS below using the registered email address you disclosed and registered with us through your Account. We will address your request within 30 business days.

About Cookies:

A cookie is a small amount of data that often includes a unique identifier that is sent to your computer or device browser from a website's computer and is stored on your device's hard drive for tracking site usage. A website may send its own cookie to your browser if your browser's preferences allow it, but, to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. Many websites do this whenever a user visits their

website in order to track online traffic flows. When you visit our Website, our system automatically collects information about your visit, such as your Technical Data, including inter alia to, your browser type, your IP address and the referring website.

Cookies stored may determine the path the client took on our site and used to anonymously identify repeat users of the website and what pages were most popular for Clients. However, we protect the Client's privacy by not storing the Client's names, personal details, emails, etc. Using cookies is an industry standard and is currently used by most major websites. Stored cookies allow the Website to be more user-friendly and efficient for Clients by allowing us to learn what information is more valued by Clients versus what isn't. You can set your browser not to save any cookies from this website, and you may also delete cookies automatically or manually. However, please note that by doing so, you may not be able to use all the provided functions of our website in full.

Please see our Cookies Policy for further details.

4. HOW WE WILL USE INFORMATION ABOUT YOU

4.1 We process the aforementioned data in compliance with the provisions of the GDPR and the applicable local legislation as amended from time to time in order to

(i) be able to perform our contractual obligations towards the client and offer them the best possible service,

(ii) provide our Services efficiently,

(iii) comply with our legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/ or (b) conduct the assessment of suitability and appropriateness test, and

(iv) protect our legitimate interests and your vital interests.

4.2 **LEGAL BASIS FOR PROCESSING**

1. For compliance with our legal and regulatory obligations, as amended from time to time, including but not limited to the applicable legislation for the Prevention and Suppression of Money Laundering and Terrorist Financing, and/or;;
2. For the performance of our contractual obligations towards you and our contract with you;
3. For the purposes of safeguarding our legitimate interests and your interests and fundamental rights do not override those interests; and/or
4. On the basis of your consent.

4.3 Indicatively, we set out below a description of all the ways we plan to use your data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process the data for more than one lawful ground, depending on the specific purpose for which we are using your data.

-	**PURPOSE ACTIVITY**	**TYPE OF DATA**	**LAWFUL BASIS FOR PROCESSING, INCLUDING BASIS OF LEGITIMATE INTEREST**
a.	1. To accept to register you as a Client 2. To notify you about changes to our terms or privacy policy 3. To communicate with you and provide you with secure identification, authentication, and support services 4. To confirm you are at the age of majority as recognized and declared by the laws of your jurisdiction	1. Identity Data 2. Profile Data 3. Contact Data 4. Data in KYC 5. Financial Data 6. Economic	1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
		Profile Data	
b.	1. To perform our Scoring Processing under which a client is scored on a scale basis with regard to the level of risk he is to Quadcode Markets	1. Banking Data 2. Economic Profile Data	1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations

c.	1. To confirm the information provided by You under (a) above in relation to your location.	1. Location Data	1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
d.	1. To secure authentication, identification, and support services via social networks protocols and use the links to your accounts in social networks for these purposes.	1. Technical Data	1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
e.	1. To confirm your source of funds and levels of income and level of trading risk.	1. Economic Profile Data 2. Conformity Data	1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations

f.	1. To process and deliver your transactions and requests (Deposits; Trades; Withdrawals) 2. Manage payments, fees and charges; 3. To collect and recover money owed to us.	1. Banking Data 2. Transaction Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interest (recover charges owed to us, make a refund in case of breach of our contract)

g.	1. To administer and protect our business and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	1. Identity Data 2. Contact Data 3. Technical Data	1. Performance of our contract with you 2. Necessary to comply with our legal obligations 3. Necessary for our legitimate interests (take reasonable steps to confirm that you do not use any ways to manipulate our platform & for running our business, provision of administration and IT services, network security, to prevent fraud)
h.	1. To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you 2. To provide you with an optimal operation on our web application, mobile and/or desktop versions of our application and monitor your	1. Identity Data 2. Contact Data 3. Profile Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business)

	behavior for the purpose of improving the efficiency and usability of our services. 3. To offer best customer experience.	4. Usage Data 5. Technical Data 6. Marketing and Communication Data	
i.	1. To study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy.	1. Transaction Data	1. Necessary for our legitimate interests (including statutory limitations provisions by applicable laws)
j.	1. To inform you about any of the following: — New services and/or products we may offer; — Any new development and/or features of the current products/services we offer for your better experience as user of the platform/services	1. Identity Data 2. Profile Data 3. Contact Data 4. Technical Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to study how customers use our products/services, to develop our products/services and grow our business)

		5. Usage Data 6. Transacti ons 7. Marketing and Communi cation Data	
k.	1. To send direct marketing of our services to you, always within the boundaries of our legitimate interests. 2. To send to you newsletters, push-messages and calls to keep you in touch with our new features and new development of the current products/services we offer, news and events and the efficient provision of the full scope of our services. Please note that we will never use your data to communicate to you and/or promote any third-party marketing material.	1. Identity Data 2. Profile Data 3. Contact Data 4. Data that may be provided by you during your activity on the Website.	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to provide effective and personalized customer services to you and to update you in relation to our services that are available to you.

		5. Marketing and Communication Data	
l.	1. To allow us to provide you with the optimal operation on our Website, mobile and desktop versions of our application and monitor your behavior for the purpose of improving the efficiency and usability of our Services. 2. To use analytics tools to track performance of the Website and marketing source of our Clients in order to optimize our marketing costs and provide you with a better experience.	1. Location Data 2. Technical Data 3. Usage Data 4. Marketing and Communication Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to provide effective and personalized customer services to you and to update you in relation to our services that are available to you).
m.	1. To allow us to monitor and train our employees for your benefit 2. To safeguard your or our interests in case of a dispute	1. Audio Data	1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations 3. Necessary for our legitimate interests

	3. To take steps for fraud prevention 4. To improve the services provided to you		

If you are an existing client of the Website where we have a legitimate interest in communicating with you, or if you have given us your consent, we will collect and process your personal data to communicate with you in case of support and/or sending newsletters, push-messages and calls to keep you in touch with our new features, news and events and the efficient provision of the full scope of our services. We will also use your data to send you marketing information regarding our services that we believe may be of interest to you via email or otherwise.

Our Website is not intended for children, and we do not knowingly collect data relating to children. As we do not allow users under the age of 18 to use our services, we need to obtain your birthdate in order to confirm the Clients' age checks.

5. OPTING OUT

If you don't want to receive any marketing newsletters or transmit your data to third-parties for marketing purposes, nor to receive notifications for updates, you can configure your preferences. Such configuring can be done when (i) opening an account or (ii) when receiving such advertising content or (iii) by logging in and going to My Account > Personal Details > Notification Settings. You may also send to us, at any time, an email to support@quadcodemarkets.com, using the registered email address you disclosed and registered with us through your Account, asking us to cease from sending such advertising content or sending your data to third-parties for marketing purposes. The aforesaid mark removal and/or e-mail received by us will oblige us to cease sending advertisement content to you within 7 (seven) business days.

6. DISCLOSURE OF DATA

We may share your data with the parties for the purposes set out above.

We take all necessary steps so that our third parties process data on our behalf to respect your data and to treat it in accordance with the provisions of the GDPR and applicable local legislation, as amended from time to time. We take all reasonable steps so that our third-party service providers do not use your personal data for their own

purposes, and only permit them to process your data for specific purposes and in accordance with our instructions.

In general, your data is used by our processors.

We strive to maintain discretion with respect to client related matters and assessments of which we acquire knowledge. We may disclose data that concerns you only if (i) we are legally required to do so; (ii) if required when you expressly order us to process a transaction or any other service and (iii) it is required for the provision of our services under our contractual relationship and/or (iv) protection of our legitimate interests, in accordance with the provisions of the GDPR and applicable local legislation as amended from time to time.

A. We may disclose your data with other entities of our group and/or affiliated entities. For example, where they are in charge of digital acquisition and may assist under an affiliate program, manage internal analysis of the usage of products and services, or offer relevant products and services which may be of interest, or offer various support services to the Company.

B. External Third Parties. Your data is shared with third-party organizations/entities, including but not limited to:

(i) **Service Providers**. We may share your data with our trusted third party service providers, who, on our behalf, operate, maintain, and/or support our IT systems and IT infrastructure, our websites, manage our payment solutions, perform statistical analysis, marketing and advertising purposes, sending newsletters, provide customer support and perform other important services for us.

(ii) **Other Affiliate Entities**. We may also disclose your data to other affiliated companies in order for them to provide us with the relevant services.

(iii) **Regulator and state authorities**. The Client's details that are provided and/or that will be provided by the client during his/her activity on the site may be disclosed by us to official authorities. We will make such disclosure only if required to be disclosed by us under applicable law, regulation or court order and to the minimum required extent.

Within the context of the control, monitoring and evaluation of the legality of the licensed investment activity of our Company by the state regulator of the Republic of Cyprus, there are mandatory requirements requiring the transfer of data of users processed by the controlled entity. Thus, we may share your data with CySEC.

The regulator arranges accounting of all the licensed services and carried out activities in order to be able to fully perform its supervisory functions and takes steps to ensure

the controlled companies' compliance with obligations under the Law which provides for the provision of investment services, the exercise of investment activities, the operation of regulated markets and other related matters (87(I)/2017), Regulation (EU) No. 600/2014, Directive 2014/57/EC and Regulation (EU) No. 596/2014.

(iv) **Other disclosures**. In addition to where you have consented to a disclosure of the data or where disclosure is necessary to achieve the purpose(s) for which, it was collected, data may also be disclosed in special situations, where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities, or otherwise where necessary for the establishment, exercise, or defense of legal claims.

In addition, a transfer of your data to another legal entity may occur as part of a transfer of our business or parts thereof in the form of a reorganization, sale of assets, consolidation, merger or similar.

Where reasonably possible, management shall ensure that third parties collecting, storing or processing personal information on our behalf have:

a. Signed agreements to protect personal information consistent with this privacy policy and information security practices or implemented measures as prescribed by GDPR;

b. Signed non-disclosure agreements or confidentiality agreements which include privacy clauses in the contract; and

c. Established procedures to meet the terms of their agreement with third parties to protect personal information.

(v) **International Transfers**. The use of service providers and disclosure of your data to other affiliated companies and/or third parties might imply a transfer of your data to third countries, which may not fall within the ambit of the GDPR (so-called **Third Countries**).

a. In such cases, we require that all recipients of your data provide appropriate safeguards to protect your data, when it is transferred to Third Countries, through the adherence to standard data protection clauses adopted by the EU Commission (cf. the GDPR article 46(2) and/or binding corporate rules adopted by the EU Commission (cf. GDPR article 47). A transfer to an affiliate and/or related company and/or third party based in a Third Country would only take place where one of the following applies:

1. The individual has given consent to the transfer of information
2. The transfer is necessary for the performance of a contract between the individual and the Company, or the implementation of pre-contractual measures taken in response to the individual's request.
3. The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between us and a third party.
4. The transfer is necessary or legally required on important public interest grounds or for the establishment, exercise, or defense of legal claims.
5. The transfer is required by law.
6. The transfer is necessary in order to protect the vital interests of the individual.
7. The transfer is made under a data transfer agreement. 8. The transfer is otherwise legitimized by applicable law.

b. Remedial action shall be taken in response to misuse or unauthorized disclosure of personal information by a third-party collecting, storing or processing personal information on our behalf.

If you want to obtain further information on any data transfers mentioned above, please contact us using the registered email address you disclosed and registered with us through your Account through the points of contact listed in the Section OUR CONTACT DETAILS below.

7. DATA RETENTION

We store your data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for your data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting and other requirements.

By law, we have to keep your data (including call recordings) during our business relationship and upon its termination, for a minimum period of 5 (five) years from the date of termination or by the user of the Platform/Service they are using. The data storage period may be extended from 5 years to 7 years upon the request of the competent authority (regulator of the Company's licensed activities).

In general, all other data is stored for a period of 30 (thirty) business days after the date of termination of the provision of our services, unless there is any other legal or regulatory reason to keep it.

At the expiration of the data retention period the data is erased by irreversible destruction, and we also inform all third parties, to whom the data was transferred, regarding such erasure and request implementation of similar actions on their part.

8. YOUR RIGHTS AND HOW TO WITHDRAW CONSENTS AND UNSUBSCRIBE

We ask you to provide us with true, accurate and updated information on your identity and not misrepresent yourself to be another individual or legal entity. Any changes in your identifying details shall be notified to the Company immediately and in any case no later than the 7th day from the date of such changes. If your data is incorrect or incomplete, please contact our support service at the contact details listed in the section OUR CONTACT DETAILS below in order to change your data.

Under certain circumstances, you have rights in accordance with the provisions of GDPR and the applicable local legislation as amended from time to time. Some of the rights are rather complex and include exemptions; thus, we strongly advise you to contact us (at the contact details listed in the section OUR CONTACT DETAILS below) and/or seek guidance from the regulatory authorities for a full explanation of these rights. You can find a summary of your rights below in this section.

A. The right to access. You have a right to obtain the confirmation as to whether or not your data is being processed by us. In addition, you have a right to obtain more detailed information about the data kept and the processing undertaken by us and under certain circumstances the right to receive a copy of this data. In order to access and view your data without downloading it, please go to the 'Access my data' in your personal cabinet, by logging onto your Account, go to Personal Data and at the bottom of the page you can proceed with your request by selecting Access my Data. In order to download all the personal data currently stored in our system, you can do so by logging into your Account, going to the Personal Data section and then Account Settings and you can proceed with your request by selecting Download My Data.

B. The right to rectification. You have the right to have inaccurate data about you rectified, and, taking into account the purpose of the processing, to have incomplete data completed. You can rectify your personal data by logging in to your Account and rectifying the data on your personal cabinet in the Personal Data section on your Account.

C. The right to erasure. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. In order to Delete

your Account and all the personal data currently stored in our system, you can do so by logging into your Account, going to the Personal Data section and then Account Settings and at the bottom of the page you can proceed with your request by selecting Terminate Account – Delete My Account and all of its data. Please note however that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. In case if you want to obtain complete erasure of your data (to apply the "right to be forgotten"), please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

D. The right to restriction of processing. You have the right to request the restriction of processing of your personal data (a) if it is not accurate;(b) where processing may be unlawful, but you do not want us to erase your data; (c) where you need us to hold the data even if we no longer require it; or (d) where you may have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

E. The right to data portability. To the extent the legal basis for the processing is your consent, and such processing is carried out by automated means, you have the right to receive your data in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others and/or in case it may be technically impossible to do so.

F. The right to object. Subject to the legal basis on which the processing activity is based, you may object to processing of your personal data. Please note that in some cases, we may have compelling legitimate grounds to process your information which we need to comply with.

G. The right to withdraw consent. To the extent that the legal basis for the processing is your consent, you have the right to withdraw from that consent at any time. This may apply to marketing purposes and/or with regard to the transfer of your data to third parties. In case you withdraw from a consent given, then we will cease to process your data, unless and to the extent the continued processing is permitted or required according to the applicable data regulation or other applicable laws and regulations. The withdrawal of your consent will in no event affect the lawfulness of processing based on consent before its withdrawal.

H. The right to complain to the data protection supervisory authority. We do our best to ensure that we protect your data, keep you informed about how we process your data, and comply with the applicable data protection regulations. In case you are not satisfied with the processing and protection of your data or the information you have

received from us, then we urge you to inform us in order for us to improve. Please also do not hesitate to contact us, if you want to make use of your rights.

If you want to exercise any of your rights mentioned above and/or obtain more information regarding your rights and/or our policies and procedures, please contact us through the points of contact listed in the Section OUR CONTACT DETAILS below. Please also provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request without undue delay.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally, it could take longer than a month if your request is particularly complex, or you have made a number of requests. In this case, we will notify you and keep you updated. We may charge you a reasonable administrative fee for any unreasonable or excessive requests we may receive, and for any additional copies of the data you may request.

If following your request to us, we are unable to provide you with a satisfactory answer, then you may lodge a complaint with the local data protection supervisory authority. The data protection supervisory authority in Cyprus is:

Commissioner for Data Protection P.O. Box 23378, 1682 Nicosia, Cyprus www.dataprotection.gov.cy

9. DATA SECURITY

We have put in place appropriate security measures to prevent your data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data breach and will notify you and the competent regulator of a breach where we are legally required to do so.

Your help is always valuable in ensuring that your data is kept safe. Upon registration to the Website (or its mobile version), the client will be asked to choose a username and password to be used by the client on each future login and for the performance of

transactions and use of our Services. In order to protect the Client's privacy and operation with the Website, sharing registration details (including, without limitation, username and password) by the client with other persons or business entities is strictly prohibited. We shall not be held responsible for any damage or loss caused to the client due to improper use (including prohibited and unprotected use) or storage of such username and password, including any such use made by a third party, and whether or not known to or authorized by the Client.

The Company's live public chat feature is not an official channel of communication between the Company and you. We will never communicate with you via the live public chat feature, and we will never ask for any information, including any personal data, via the live public chat feature. The live public chat feature is designed for public conversations and as a tool to allow users to communicate and interact between them in real time around the topic(s) they are interested in. Please note that the live public chat features non-private channels of communication, information communicated via the live public chat feature can be accessed by any person. We do not control the content shared via the live public chat feature, and we shall not be held responsible in any way and for any actions taken or information shared via the live public chat feature. You can find more information on how the live public chat feature operates here.

Any use of the Website with the Client's username and password is the Client's sole responsibility. We shall not be held responsible for any such use, including for validation that the client is actually operating in his/her account.

The client is obliged to forthwith notify our client support service of any suspicion of unauthorized use of the Client's account. You may contact us at any time through the points of contact listed in the Section OUR CONTACT DETAILS below.

Encryption of your data in transit. Encryption provides a high level of security and privacy for your data. When you enter your data on our platform, we use strong encryption technologies (such as Transport Layer Security) to protect your data during transmission from your devices to our servers.

For providing more trust and security, we use digital EV (Extended Validation) Certificates issued by trusted Certificate Authorities. You can see the 'Green Bar' in the supported browser versions which confirms what all transmitted data is secure.

Protection of your data in our infrastructure. We make it a priority to develop services that are secure "by default". The "default" security of our services means that every new service and feature is designed with strict security requirements in mind before we even begin development. This is the key to guaranteed protection and privacy of all data that our services handle and store, once the service or new feature is released.

To secure your data, we use the pseudonymization which allows most of our services to operate without using your actual data. Instead of that, our services use a system ID that can't be traced back to identify you.

We are always vigilant about the security of your data stored in our infrastructure. Because of that, we locate all our equipment which is used for your data processing in secure data centers. Network access to this equipment is isolated from the Internet. We use network segmentation for isolation of services which need different levels of security from each other. In addition, we restrict logical access to your data for our employees on a “need to know” basis. So, only personnel who really require access to your data for the purpose of providing you with our best service will have access to it.

Threats protection. Our Company is highly knowledgeable about modern threats to data security and privacy, and we are well-prepared to combat them. All events that occur in our infrastructure are continuously monitored, analyzed and responded to, which allows us to ensure proper protection of your data, keeping it safe from threats, vulnerabilities, and the effects of malware.

In the event of a failure that affects the accessibility of your data, we have data backup and recovery procedures in place that will help us to restore your data in a short time. To guarantee quick recovery, we use high availability mode enabled for most critical databases, which allows us to minimize downtime.

Employee awareness of data security. Our employees may handle your data in order to provide you with first-class service. To guarantee the security and confidentiality of your data, we monitor all employees’ actions with access to your data in our systems and grant access strictly on a “need to know” basis: only employees who need access will receive it. We hold regular training sessions to make sure that each employee understands the principles that we follow to achieve robust data security and privacy.

If you choose not to give your personal information. In the context of our business relationship, we may need to collect data by law, or under the terms of a contract we have with you. Without this data, we are, in principle, not in a position to close or execute a contract with you.

If you choose not to give us this data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies.

To what extent we carry automated decision-making and profiling. In establishing and carrying out a business relationship, we generally do not use automated decision-making. If we use this procedure in individual cases, we will inform you of this separately. In some cases, we may proceed with profiling in order to evaluate certain

personal aspects. We shall inform you accordingly in case we perform any profiling. In general, any data collection that is optional would be made clear at the point of collection.

10. OUR CONTACT DETAILS

Who is responsible for the data processing and who you can contact.

Responsible for your data processing is **QUADCODE MARKETS** and you can contact us using the details set out below:

Quadcode Markets, 82nd road, 4 Kato Polemidia, 4153, Limassol, Cyprus.

Email: support@quadcodemarkets.com

Data Protection Officer

We have appointed a data protection officer (hereinafter **DPO**) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this privacy policy, including requests relating to the data, please contact the DPO using the details set out below:

Quadcode Markets, 82nd road, 4 Kato Polemidia, 4153, Limassol, Cyprus.

Email: dpo@quadcodemarkets.com

To enable us to process your request, please contact us using the registered email address you disclosed and registered with us through your Account. We may require that you provide us with proof of your identity, such as by providing us with a copy of a valid form of identification. This is to ensure that we appropriately protect the personal data we hold from unauthorized access requests and comply with our security obligations.

If you have any questions, or want more details about how we use your data, you may contact us at the above contact details, and we will be happy to provide you with further details.

Further to the above, you have the right to contact the Office of the Commissioner for Personal Data Protection, the Cypriot supervisory authority for data protection issues.

11. LINKS TO OTHER WEBSITES

We may provide links to third-party websites on our Website. These linked websites are not under our control, and we therefore cannot accept responsibility or liability for the

conduct of third parties linked to our websites, including without limitation to the collection or disclosure of your data. Before disclosing your data on any other website, we encourage you to examine the terms and conditions of using that website and its privacy policies.

12. CHANGES TO THIS PRIVACY POLICY

1. This Privacy Policy was last updated on April 08, 2025. We have the right, at our discretion, to add, modify or remove portions of this Privacy Policy from time to time to ensure that the information herein provides relevant and adequate information about our collecting and processing of your data.
2. This privacy policy may be supplemented by other information received from the Quadcode Markets and other terms and conditions applicable to the Website or which you have agreed to as part of your interaction with us.
3. In case of updates, we will post the revised Privacy Policy on our website. Changes will take effect as soon as the revised version is made available on our website. Your comments and feedback are always welcome. You may contact us at any time through the points of contact listed in the Section OUR CONTACT DETAILS above.