onequity

# Privacy Policy

NOVEMBER 2025

**OnEquity Ltd**
FSA License
No. SD154

## 1. Introduction

This policy sets out the different areas, where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

## 2. Definitions Our Commitment to You

**OnEquity Ltd** (“the Company” or “we” or “us” or “our”) understand the importance of maintaining the confidentiality and privacy of the Client`s Personal Data. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps, to protect the confidentiality, security, and integrity of your Personal Data.

We will not sell, purchase, provide, exchange or in any other manner disclose Account or Transaction data, or personal information of or about a Cardholder to anyone, except, it’s Acquirer, Visa/Mastercard Corporations or in response to valid government demands.

## 3. Definitions

**`biometric data`** mean personal data resulting from specific technical processing relating to the physical, physio- logical or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data;

**`consent`** of Client shall mean any freely given, specific, informed and unambiguous indication of the Client`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;

**`controller`** shall mean 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;

**`genetic data`** shall mean personal data relating to the inherited or acquired genetic characteristics of a natural person, which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

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**`personal data`** shall mean any information relating to an identified or identifiable natural person; 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`** shall mean 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;

**`processor`** shall mean a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller;

**`third party`** shall mean a natural or legal person, public authority, agency or body, other than the Client, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

## 4. Collection of Information

If you decide to apply for opening an account with us and thereafter to become our Client, there is certain information, which we will require from you, in order to complete your request.

As a Data Controller of your information - the Company, the legal basis for collecting and using the Personal Data described in this Privacy Policy, depends on the personal information we collect and the specific context, in which we collect the information.

The Company will retain your personal information only for as long as it is necessary, for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary, to comply with our legal obligations, resolve disputes, and enforce our policies.

The collected information includes, but is not limited to, personal details such as name, address, date of birth, contact details, payment details, including credit card, debit card and bank account details, tax identification numbers and other necessary financial information.

The Company will not require or collect any generic data, medical history, clinical treatment or the physiological or biomedical state.

We may collect your Personal Data in two possible ways:

- When you directly give it to us (through your completed Account Opening Application Form); or
- When you give us the permission to obtain it from other sources (for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers.

We may also collect your Personal Data, in regard to your use of our website(s), such as pages visited, frequency, duration of visit and trading activities, or by choosing to send us your location data, when accessing our website from your smartphone.

From time to time we may also request further information, to help us improve the Services, which we provide you with (if you are our Client), or our activities (if you are our Provider for Trading Data), under our relevant Agreement, as the case may be, or comply with applicable regulations.

If you choose not to register or provide personal information, you can still use our website, but you will not be able to access areas, which require registration.

## 5. Children's Information

Another part of our priority is adding protection for children, while using the internet. Children merit specific protection, regarding their Personal Data, as they may be less aware of the risks, consequences and safeguards concerned and their rights, in relation to the processing of Personal Data.

The Company do not collect any Personal Data from children. Moreover, the Client will declare, dring the account opening procedure, as well as consent with the Client`s Agreement, that he/she is over eighteen (18) years of age, in the case of an individual, or has full capacity, in the case of a legal person.

## 6. Use of the Information

We will use, store, process and handle your Personal Data (in case you are a natural person), in connection with the Agreement between us, in accordance with all Data Protection Privacy Laws - Official Information Act 1997, The Data Privacy Act 1977 and The Personal Information Privacy Act, with regard to the processing of personal data and on the free movement of such data.

When you join us, you provide us with your contact information and email address. We use this information to send you updates about your account with us, questionnaires to measure your satisfaction with our services and announcements about new and exciting services, which we offer.

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Your Personal Data which we hold, is to be treated by us as confidential and will not be used for any purpose, other than in connection with the provision, administration and improvement of our Services to you, or the furthering of our Agreement between us, establishing and managing your account or a relationship between us, reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or opportunities, which we believe, may be relevant to you, improving our relationship, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes, as applicable.

By entering an Agreement with us (to become our client), you will be consenting to the transmittal of your Personal Data to third parties for the provision of the agreed services.

Each Client is able to select the kinds of information he/she wants to receive from the Company by subscribing to various services, like electronic newsletters. If you do not want us to communicate with you about other offers regarding, products, programs, events, or services by email, postal mail, or telephone, you may select the option stating, that you do not wish to receive marketing messages from us.

## 7. Customer Profiles

Each registered Client has a unique personal profile (account). Each profile is assigned with a unique personal identification number, which helps us ensure, that only you can access your profile.

When you register with us, we create your profile and assign a personal identification number. This code is uniquely yours. It is your „passport“ to seamless travel across our website, allowing you to download free software, order free newsletters, and visit premium sites without having to fill out registration forms with information you have already provided. Even if you change your device, you won't have to re-register – just use your Registration ID number to identify yourself.

## 8. Right of Access

Under the Data Protection Privacy Laws, you as a natural person, have the right to obtain a copy of any personal information, which we hold about you and to advise us of any perceived inaccuracy, or would like to be removed from our database.

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We will provide you with the means to ensure, that your personal information is correct and current. You may review and update this information at any time.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have about you.
- The right of rectification.
- The right to object.
- The right of restriction.
- The right to data portability
- The right to withdraw consent (please refer to Section 9)
- The right to lodge a complaint with a supervisory authority

With respect to the information relating to you, which ends up in our possession, and recognising, that it is your choice to provide us with your personally identifiable information, we commit to give you the ability to do all of the following:

- You can verify the details you have submitted to us, by contacting our customer support at support@onequity.com . Our security procedures mean, that we may request proof of identity, before we reveal information, including your e-mail address and possibly your address.
- You can also contact us by the same method to change, correct, or delete your personal information, controlled by the Company, regarding your profile at any time. Please note, that if you have shared any information with others through social media channels, that information may remain visible, even if your account is deleted/deactivated.
- You are also free to close your account. If you do so, your account will be deactivated. However, we may retain archived copies of your information as required by law or for legitimate business purposes (including to help address fraud and spam).
- You can always feel free to update us on your details at any point

To make a request, please contact us, verifying your identity and specifying what information you require.

## 9. Contacting You

We may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, email, or post.

If you agree, we may contact you from time to time, by telephone, email or post for marketing purposes, to bring to your attention products or services, which may be of interest to you or to conduct market research.

**10. Disclosure of Information**

Under the Agreement between us, we have the right to disclose your Personal Data (including recordings and documents of a confidential nature) in certain circumstances. According to the Agreement between us, your Personal Data may be disclosed:

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a) where required by Law or a court order by a competent Court;
b) where requested by a Regulatory Authority, having control or jurisdiction over us, or you or our associates, or in whose territory we have Clients or Providers, as applicable;
c) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
d) a broker in order to execute your Instructions or Orders, and for purposes ancillary to the provision of our Services to you as our Client;
e) to credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of you. To do so, they may check the details you supplied, against any particulars on any database (public or otherwise), to which they have access. They may also use your details in the future, to assist other companies for verification purposes. A record of the search will be retained by us;
f) to our professional advisors, provided that in each case, the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
g) to other service providers, who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services, which aim to assist us collect, storage, process and use your Personal Data or get in touch with you or improve the provision of our Services or activities under the Agreement between us;
h) to a Trade Repository or similar;
i) to other service providers for statistical purposes, in order to improve our marketing, in such a case, the data will be provided in an aggregate form;

j) to market research call centres, which provide telephone or email surveys with the purpose to improve our Services or activities, but only contact details;
k) where necessary, in order for us to defend, or exercise our legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority, as the case may be.
l) at your request or with your consent;
m) to our Affiliates/Partners or any other company in our group;
n) to our employees, to enable them to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.

**11. Safeguard Measures**

Your Personal Data is stored on secure servers. We limit the access of your Personal Data only to those employees or partners, who need to know the information, in order to enable the carrying out of the Agreement between us.

Moreover, we have procedures in place, regarding the safeguarding and usage of your Personal Data, which will not be kept for longer than it is necessary, for the purposes for which it has been initially obtained. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information, which 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.

The Company shall ensure, that it deletes personal data, unless otherwise provided for by national law, which shall determine, under which circumstances the Company may or shall further retain data.

After the Company have carried out a thorough assessment of the necessity and proportionality of such further retention and consider it to be justified, as necessary for the prevention, detection or investigation of money laundering or terrorist financing, the Company may be allowed to further retain data. That further retention period shall not exceed five (5) additional years.

While we will use all reasonable efforts to safeguard your Personal Data, you acknowledge, that the use of the internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

The Company strictly protect the security of your Personal Data and honors your choices for

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its intended use. We carefully protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

Your Personal Data is never shared outside the Company without your permission, except under conditions explained above. Inside the Company, the Data is stored in password-controlled servers with limited access.

You also have a significant role in protecting your Personal Data. No one can see or edit your personal information without knowing your user name and password, so do not share these with others.

**12. Change of Information**

You are obligated to inform the Company at any time, if your Personal Data has changed by emailing us at support@onequity.com .We will amend your Personal Data, in accordance with your instructions, except to the extent, that we are required to hold your Personal Data for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

**13. Questions**

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at support@onequity.com.

**14. Update of this Policy**

This Policy is subject to change without a notice. For this reason, you are advised to look for updates from time to time.

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