

## PRIVACY POLICY

### INTRODUCTION

Multi Bank Management needs to collect personal information from our clients and prospective clients in order to provide them with our products, services and any relevant information.

Your privacy is very important to us and we make it our priority to safeguard and secure any and all confidential information relating to individuals.

This Privacy Policy will go through what measures Multi Bank Management (the “Company” or “MBM”) takes to collect, uses and manages the personal information we receive from you or a third party in relation to the products and services we provide. This Privacy Policy also outlines your rights relating to the processing of your personal information.

Our Privacy Policy is reviewed and updated regularly in order to be compliant with data protection laws and other privacy regulations.

### Multi Bank Management

Multi Bank Management No. 354945, registered at 4th Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman KY1-1002, Cayman Islands.

### PRIVACY PROTECTION

Multi Bank Management respects the privacy of any users who access its website(s), and therefore is committed to taking all reasonable steps to safeguard the privacy and confidential information of all clients and visitors of our website, in accordance with the applicable data protection laws and regulations. To ensure this, we have trained our staff on the importance protecting and respecting your personal information and privacy. We have also appointed a Data Protection Officer to ensure that our Company manages/processes your personal information in compliance with the applicable data protection laws and regulations and in accordance with this Privacy Policy.

The personal information you provide us with when registering yourself as a user of the Company’s website(s) or of its services is classified as registered information, which is protected in several different ways. You can access your registered information after logging in to MyMBM.

It is your responsibility to make sure that your password is only known to you and not disclosed to anyone else. Your registered information is securely stored with us, and only authorized staff have access to this information. Please also note that transfer of information via the internet is not always entirely secure, but we have taken significant precautions to assure that your personal data is being protected.

### PERSONAL INFORMATION WE COLLECT

As part of our application process and in order to open any type of account with us, you must first complete and submit an application form with all the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant laws (including their regulations). The information you provide may also be used by the Company to inform you regarding its services.



The information that we may collect from you includes the following:

- Full name
- Residential address
- Contact details (e.g. telephone number, email address, etc.)
- Date of birth, place of birth, gender, citizenship
- Information about your income and wealth, including details about your source of funds, assets and liabilities, bank account information, trading statements, financial statements
- Trading account balances, trading activity, your inquiries and our responses
- Profession and employment details
- Authentication data (e.g. signature)
- Location data
- Trading performance, knowledge and experience
- Verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us). Furthermore, we may collect other identifiable information, such as identification numbers and/or passport/tax registration numbers
- Any other information customarily used to identify you and about your trading experience which is relevant to us providing our services to you.

We obtain this information in a number of ways through your use of our services, including through any of our websites, apps, the account opening applications, our demo account forms or customer service communications. We may also collect this information about you from third parties such your payment providers and through publicly available sources. We also keep records of your trading behavior, including records regarding the following:

- Products you trade with us and their performance
- Historical data about the trades and investments you have made, including the amount invested
- Your preference for certain types of products and services

If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

## **PROCESSING OF YOUR PERSONAL INFORMATION**

We may process your personal data on the following bases and for the following purposes:

### **1. PERFORMANCE OF A CONTRACT**

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with our clients (i.e. so as to perform our contractual obligations). In addition, processing of personal data takes place to be able to complete our client on-boarding/acceptance procedures.



In view of the above, we need to verify your identity in order to accept you as our client and we will need to use those details in order to effectively manage your trading account with us. This may include third parties carrying out credit or identity checks on our behalf. The use of your personal information is necessary for us to know who you are as we have a legal obligation to comply with 'Know Your Customer' and customer due diligence' regulatory obligations.

## **2. COMPLIANCE WITH A LEGAL OBLIGATION**

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (e.g. anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These obligations apply at various times, including client on-boarding/acceptance, payments and systemic checks for risk management.

## **3. FOR THE PURPOSES OF SAFEGUARDING LEGITIMATE INTERESTS**

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Examples of such processing activities include the following:

- Initiating legal claims and preparing our defense in litigation procedures
- Risk management
- Measures to manage business and for further developing products and services
- Measures to ensure IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures
- Sharing your personal data within Multi Bank Management for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework

## **4. YOU HAVE PROVIDED YOUR CONSENT**

Our storage and use of your personal data is based on your consent (other than for the reasons described or implied in this policy when your consent is not required). You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected.

## **5. TO PROVIDE YOU WITH PRODUCTS AND SERVICES, OR INFORMATION ABOUT OUR PRODUCTS/SERVICES, AND TO REVIEW YOUR ONGOING NEEDS**

Once you successfully open a trading account with us, or subscribe to an update, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to try to ensure that we are providing the best products and services so we may periodically review your needs based on our assessment of your personal information to try to ensure that you are getting the benefit of the best possible products and services from us.



## **6. TO INVESTIGATE OR SETTLE ENQUIRIES OR DISPUTES**

We may need to use personal information collected from you to investigate issues or to settle disputes with you because it is in our legitimate interests to ensure that issues and disputes get investigated and resolved in a timely and efficient manner.

## **7. TO COMPLY WITH APPLICABLE LAWS, COURT ORDERS, OTHER JUDICIAL PROCESS, OR THE REQUIREMENTS OF ANY APPLICABLE REGULATORY AUTHORITIES**

We may need to use your personal information to comply with any applicable laws and regulations, court orders or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

## **8. DATA ANALYSIS**

Our webpages and emails may contain web beacons or pixel tags or any other similar type of data analysis tools that allow us to track receipt of correspondence and count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal information (such as trading history) with the personal information of our other clients on an anonymous basis. If your personal information is not in an anonymized form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

## **9. MARKETING PURPOSES**

We may use your personal information to send you marketing communications by email, phone, SMS or other methods (such as social media channels) to ensure that you are kept up to date with our latest products and services. We will not disclose your information to any outside parties that may allow them to directly market to you.

## **10. INTERNAL BUSINESS PURPOSES AND RECORD KEEPING**

We may use your personal information for internal business and research or record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services and products we provide to you. We will also keep records to ensure that you comply with your contractual obligations pursuant to the agreement governing our relationship with you.

## **11. LEGAL NOTIFICATIONS**

Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the terms or the features of our products or services. We need to process your personal information to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.



## 12. PHYSICAL SECURITY

If you enter any of our premises we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

The Company will not disclose any of its clients' confidential information to a third party, except: (a) to the extent that it is required to do so pursuant to any applicable laws, rules or regulations; (b) if there is a duty to disclose; (c) if our legitimate business interests require disclosure; or (d) at your request or with your consent or to Persons described in this policy. The Company will endeavor to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information. As part of using your personal data for the purposes set out above, the Company may disclose your personal information to the following:

- Any companies related to Multi Bank Management, meaning any of our ultimate holding companies and their respective subsidiaries may receive such information;
- Our associates and service providers, for business purposes, including third parties such as business service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, research or other services;
- Business introducers with whom we have a mutual business relationship;
- Business parties, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- Anyone authorised by you.

If the Company discloses your personal information to business parties, such as card or other payment processing companies or banks, in order to perform the services requested by clients, such third parties may store your information in order to comply with their legal and other obligations.

Clients accept and consent that the Company may, from time to time, analyze the data collected while visiting our website(s) or by other means, such as questionnaires, for statistical purposes in order to improve the Company's business activities.

## TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA

We may transfer your personal information outside the European Economic Area (EEA) to other Multi Bank Management companies as well as service providers (i.e. processors) who are engaged on our behalf. To the extent we transfer your information outside the EEA, we will ensure that the transfer is lawful and that processors in third countries are obliged to comply with the European data protection laws or other countries' laws which are comparable and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

By submitting your personal data, you consent to your personal information being processed by staff of Multi Bank Management operating outside the EEA who work for us. Such staff may be, among others, engaged in the fulfilment of your requests, the processing of your payment details and the provision of support services. The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.



## YOUR COLLECTED INFORMATION

Tracking systems used on the Company's website(s) may collect your personal data in order to optimize the services provided to clients/potential clients. The website collects information in the following ways:

### DEVICE INFORMATION

By recognizing your device used to access and use the Company's website(s), we can provide you with the most appropriate version of our website(s).

### LOG INFORMATION

Logging certain behaviors on the site enables the company to track user action and therefore troubleshoot any issues that may occur.

### LOCATION INFORMATION

Using your IP address helps us localize our website content, which we provide to you based on your country, and improve your user experience on our site(s).

## COOKIES

Cookies are text files with a small amount of data sent from our website(s) to your browser and stored on your computer's hard drive. Cookies help us improve the performance of our website(s) and our website visitors' experience, track your referrer (if any) and improve our future advertising campaigns.

## COOKIES

Cookies are small pieces of data sent from our website(s) to your browser and stored on your computer's hard drive when using our site(s), and they may include a unique identification number. The purpose of collecting this information is to provide you with a more relevant and effective experience on our website(s), including the presentation of our web pages according to your needs or preferences. Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website(s) if you choose to disable the cookie acceptance in your browser, particularly in your MyMBM account panel and other secure parts of our website(s). We therefore recommend you to enable cookie acceptance in order to benefit from all our online services. Furthermore, we use cookies for re-marketing features in order to allow us to reach out to users who have previously visited our website(s) and have shown an interest in our products and services. Periodically, we may use third party vendors to display our ads over the internet to you, based on your previous use of our website(s). You can opt out this particular use of cookies at any time by visiting [Google's Ads Settings](#) page and the [DoubleClick opt-out](#) page or as they later update those facilities.

The Company uses session ID cookies and persistent cookies. A session ID cookie expires after a set amount of time or when the browser window is closed. A persistent cookie remains on your hard drive for an extended time period. You can remove persistent cookies by following directions provided in your web browser's 'Help' file.



## HOW WE OBTAIN YOUR CONSENT

If our use of your personal information requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s), as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

If we rely on your consent as our legal basis for holding and processing your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this Privacy Policy.

## STORAGE OF YOUR PERSONAL INFORMATION AND RETENTION PERIOD

In relation to your personal information, we will hold this for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time (after you cease being our client). For example, we are subject to certain anti- money laundering laws which require us to retain the following, for a period of 5 years after our business relationship with you has ended:

- A copy of the documents we used in order to comply with our customer due diligence obligations;
- Supporting evidence and records of transactions with you and your relationship with us

Also, the personal information we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e., 7 years after our business relationship with you has ended or longer if you have legitimate interests (such as handling a dispute with you). If you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

## YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

### INFORMATION AND ACCESS

You have the right to request what information we process, along with a copy of that personal information within thirty (30) days from the date of your request. If you require additional copies, we may need to charge a administration fee.



## RECTIFICATION

We will take all reasonable steps to make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. You may inform us at any time that your personal details have changed by e-mailing us at [support@multimanagement.io](mailto:support@multimanagement.io). The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e. personal information that we are required to keep for regulatory or other legal purposes.

## ERASURE

You can ask us to delete or remove your personal information in certain circumstances such as if we no longer need it or you withdraw your consent (if applicable) provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal information to others, we will let them know about the erasure where possible.

## PROCESSING RESTRICTIONS

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances such as if you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information. We will inform you before we decide not to agree with any requested restriction. If we have disclosed your personal information to others, we will inform about the restriction if possible.

## DATA PORTABILITY

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

## OBJECTION

You can ask us to stop processing your personal information, and we will do so, if we are:

- Relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- Processing your personal information for direct marketing;
- Processing your personal information for research unless we reasonably believe such processing is necessary or prudent for the performance of a task carried out in the public interest (such as by a regulatory or enforcement agency).

## OPT-OUT OF SUBMITTING YOUR PERSONAL INFORMATION

If you do not want us to use your personal information, you must inform the Company by sending an email to [support@multimanagement.io](mailto:support@multimanagement.io). If you decide to do so, we may not be able to continue to provide information, services and/or products requested by you and we will have no liability to you in this respect.



## LEGAL DISCLAIMER

The Company may disclose your personally identifiable information as required by rules and regulations and if the Company believes that disclosure is necessary to protect our rights or to comply with other proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. The Company is not liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention or otherwise by you or due to your acts or omissions or a person authorized by you (whether or to that authorization is permitted by the terms of our legal relationship with you).

## HOW TO CONTACT US

If you have any questions or concerns regarding this Privacy Policy, please e-mail us at [support@multimanagement.io](mailto:support@multimanagement.io)