

**JUSTMARKETS
CONFIDENTIALITY AND PRIVACY
POLICY**

Version: May 2024

1. INTRODUCTION

This Privacy Policy (hereinafter referred to as the “Policy”) describes the main aspects of how JustMarkets collects, uses and manages the personal information received from Clients, in connection with the provision of services.

One of the main priorities of JustMarkets is the full security of Clients' information. JustMarkets does not allow this information to become open to the general public and to be used by third parties. JustMarkets does not provide, sell, disclose, or give for temporary use of Client's information and account details to third parties. JustMarkets values its reputation and respects the JustMarkets's Clients.

2. GATHERING THE INFORMATION

By opening an account the Client agrees to and accepts all of the provisions set forth in this Policy.

In order to open an account with JustMarkets, the Client must first register on the website of JustMarkets by providing the required information, which includes: full name, date of birth, country of residence, complete address, phone number and city code etc. This information is given by the Client during the registration process through the Personal Area. Gathering information is an obligatory condition for the beginning of a business relationship with JustMarkets. The information that Clients provide to JustMarkets may also be used by JustMarkets to inform Clients regarding JustMarkets' services.

Ultimately, the information provided by the Client belongs to said Client.

3. PERSONAL DATA THAT IS COLLECTED BY JUSTMARKETS

Personal data, provided by Clients includes:

- information provided by the Client during the Personal Area registration (full name, date of birth, country of residence, complete address, phone number and city code);
- documents that allow JustMarkets to verify the Client's Personal Area, namely government-issued identification documents (passport, national ID, driver's licence, or similar documents) and documents that confirm the place of residence (utility bill – gas, water, electricity or other), bank statement or any government issued document which can verify the clients address (refer to the JustMarkets' AML Policy for more details);
- documents that confirm money transfer (in case of bank transfer, based on the JustMarkets' decision).
- and any other information customarily used to identify the Client, if this is legally required.

If you decide not to provide some data from this list, we may not be able to provide you with some requested services.

4. USE OF INFORMATION

Information given by the Client is used to provide quality services. For example, the Client's contact information may be used in case JustMarkets needs to contact the Client urgently or to inform the Client about any JustMarkets' updates and news. By providing information about himself/herself, the Client verifies their Personal Area thus participating in bringing the AML policy to life.

Client's data is used to confirm the client's identity, to open trading and/or partner accounts, to quickly inform about new services of JustMarkets, to maintain the database of customers' accounts, and to analyze statistical data for providing services and products of higher quality.

Personal data given by the Client can also be used for the following purposes:

- legal compliance;
- performance of contractual obligations;
- marketing purposes.

5. INFORMATION PROTECTION

JustMarkets uses advanced technology to provide the security of personal data. JustMarkets has put in place appropriate security measures to prevent accidental loss, use, unauthorized access, modification or disclosure of personal data. JustMarkets staff maintain strict standards in the process of transferring information within JustMarkets.

JustMarkets limits access to your personal data to those staff members who require access to limited data of Clients and only specific categories of staff have full access to personal data of Clients (e.g. verification or account managers).

Any information and access will be encrypted using SSL technology. Where JustMarkets has given to the Client (or where the Client has chosen) a password which enables the Client to access certain parts of JustMarkets' website, the Client is responsible for keeping this password confidential. JustMarkets will not ask the Client to share their password with anyone.

JustMarkets shall ensure to implement reasonable and appropriate organisational, physical and technical measures to protect your personal data and shall inform you of any breaches resulting from unauthorised disclosure of your personal data. In the event of such a breach, JustMarkets shall also notify the regulatory bodies.

6. RETENTION PERIOD

The retention period for personal data storage is 7 years. After the retention period has passed, JustMarkets has the right to remove all data, which was received from the Client when it considers that personal information is no longer necessary for the purpose for which it was collected.

JustMarkets may keep personal data for longer than 7 years for legal, regulatory, or technical reasons.

7. DISCLOSURE OF INFORMATION TO THIRD PARTIES

JustMarkets will not rent or sell information about the Client to third parties outside JustMarkets without the consent of the Client.

JustMarkets may provide information about the Client to third parties only under special circumstances. Such circumstances may be:

- protection of personal rights and property in the court;
- implementing the court orders;
- providing information to law enforcement authorities at official request;
- transferring of information to business partners (trustees) to improve the quality of service.

In order to give the Clients comprehensive, state-of-the-art high-quality service, JustMarkets may exchange personal data with its partners. However, the use of Client's personal data is limited to sharing the account number with one of the partners at their request. On certain occasions, full personal information will be shared to improve the quality of service. At the request of the Client, JustMarkets can provide information about the services that the partners provide for it.

You agree that we will disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case personal data about its customers will be one of the transferred assets. You also agree that we will share your personal information with third parties for verification purposes.

Any third party using the personal data of clients must abide by the provisions of this policy.

8. CHANGES IN PERSONAL INFORMATION

Because JustMarkets assumes that all the information is full and relevant, the Company asks the Client to notify JustMarkets of any changes in the personal data via the appropriate forms of the Personal Area.

9. RIGHTS OF THE CLIENT

Every Client has the following rights regarding the processes of collecting, using, and managing his/her personal information:

- a) the right to be informed and the right to access;

JustMarkets describes the procedure for processing personal data in this Policy. We have tried to make this Policy easy and understandable for our Clients, but if you have any inquiries regarding this Policy or your rights, or if you need additional information, you can email us at support@justmarkets.com.

- b) the right to rectification;

If you know we have the wrong data about you, or that your data is incomplete you are entitled to have it rectified. You may inform us at any time that your personal details have changed by sending an email to us.

- c) the right to restrict processing;

You can ask us to restrict 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.

d) the right to data portability;

You have the right to obtain personal information that you have provided us with and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

e) the right to object;

You can ask us to stop processing your personal information in certain circumstances. Also, if you receive emails from us, you can always opt-out at the bottom of the email, or by contacting us.

f) the right to 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 provided that we have no legal obligation to retain that data. Such requests will be subject to any retention limits, which we are required to comply with in accordance with applicable laws and regulations.

g) the right for refusal.

The Client has the right to refuse to provide the personal information required by the legislation if it goes against the Client's beliefs. However, in this case, JustMarkets would not be able to provide its services to the Client.

If you do not want us to use your personal data, you must inform JustMarkets by sending an email to support@justmarkets.com. JustMarkets will not be able to continue to provide services and information requested by the Client if the Client makes such a decision.

10. UPDATES TO THIS POLICY

From time to time JustMarkets has the right to update this Policy to ensure that any new services, requirements, and technologies, as well as any changes to our business operations, are taken into consideration, as well as any changes to legislation.

In case of any updates to this Policy, JustMarkets will post the changes to this Policy and inform Clients via the JustMarkets' website and/or by sending an email.