




Privacy Policy
March 2026
V 2.1

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PRIVACY POLICY

UBK Markets Ltd (hereafter “the Company”), is responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

The collection of personal information

The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively.

The information the Company collects includes information required to communicate with and identify its clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.

Usage of personal information

The Company uses clients’ personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes.

If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following address: office@ubkmarkets.com

Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a ‘need-to-know’ basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Affiliates and Partners

The Company may share information with affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients’ needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.

Non-affiliated third parties

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The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy Policy.

The Company reserves the right to disclose personal information to third parties where required by Law, regulatory and other government authority. The Company may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

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

Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

Contact Clients

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company's contract for differences trading. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

Restriction of responsibility

The Company is not responsible for the privacy policies or the content of sites to which links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

Use of "COOKIES"

The Company uses cookies to secure clients' trading activities and to enhance the performance of the web site. Cookies used by the Company do not contain personal information or other sensitive information.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve web site, the Company may use third parties to track and analyze usage and statistical volume information.

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The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Privacy Policy Updates

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded in the Company's website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's

Privacy Policy Update Notification

Where a material change is made to this Privacy Policy that affects the way personal data (including payment data) is collected, processed, or shared, the Company will notify all registered Clients by email at least thirty (30) calendar days prior to the effective date of the change. Website posting alone is insufficient for material changes.

Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

Data Retention Schedule

The Company retains personal data for the following periods: (a) KYC/identity records: five (5) years from the date of termination of the business relationship, in accordance with EU Anti-Money Laundering Directives and CySEC Directive DI144-2007-08; (b) transaction and trade records: seven (7) years from the date of the transaction, in accordance with MiFID II Article 25; (c) marketing and consent records: until such time as consent is withdrawn by the data subject; (d) website analytics and cookie data: twenty-six (26) months from the date of collection; (e) payment credential data: as specified in the Client Agreement.

Where there is no specific legal or regulatory retention obligation, personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected.


Right to Data Portability and Supervisory Authority

Right to Data Portability: In addition to the rights described above, Clients have the right under GDPR Article 20 to receive the personal data they have provided to the Company in a structured, commonly used and machine-readable format, and to transmit that data to another controller without hindrance.

Right to Lodge a Complaint: Clients who believe that their data protection rights have been infringed have the right to lodge a complaint with the competent supervisory authority. The relevant supervisory authority for the Company is the Commissioner for Personal Data Protection of the Republic of Cyprus (www.dataprotection.gov.cy).

Payment Credential Retention

The Company retains payment card credentials (including tokenised card references) only for as long as necessary to perform the services for which they were provided. Stored card credentials will be retained

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for a maximum of 3 months following the last successful transaction. Credentials relating to closed accounts will be purged within [30/60] calendar days of closure.

DSS Compliance

The Company (and its authorised payment processors) processes cardholder data in accordance with the Payment Card Industry Data Security Standard (PCI DSS). The Company does not store full Primary Account Numbers (PAN), CVV2/CVC2 codes, or magnetic stripe data on its own systems. All payment credential storage is managed through PCI DSS-certified processors.

International Data Transfers

Where personal data (including payment data) is transferred outside the European Economic Area (EEA), the Company ensures that appropriate safeguards are in place in accordance with GDPR Article 46. These safeguards include Standard Contractual Clauses (SCCs) approved by the European Commission, adequacy decisions, or other mechanisms permitted under applicable law.

The Company maintains a register of all international data transfers and conducts Transfer Impact Assessments where required. Details of the specific safeguards in place for each material jurisdiction where data may be processed are available upon written request.