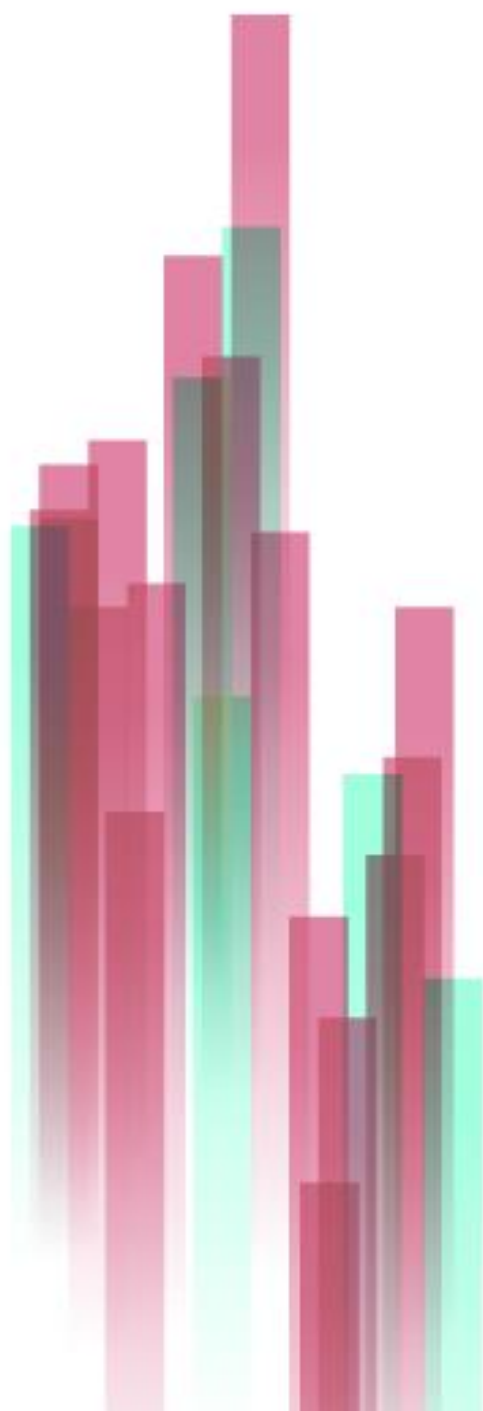




Website and App Privacy Policy

Version 8 (July 2025)



We ask that you read this website Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and/or the supervisory authorities in the event you have a complaint.

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1. General Information

- 1.1. This website is operated by **Squared Financial (CY) Limited**, with registration number HE355968 (hereinafter referred to as the “**Controller**” or “**Company**” or “**We**” or “**Us**”).
- 1.2. We collect and use certain personal information about you. When we do so, we are regulated under the General Data Protection Regulation 2016/679 (hereinafter referred to as the “**GDPR**”), which applies across the European Union, and the national law on the protection of personal data Law 125(I)/2018 (hereinafter referred to as the “**Privacy Law**”). We are responsible as ‘controller’ for that personal information pursuant to the GDPR.
- 1.3. This Privacy Policy is incorporated into, and subject to, the Company’s Client Agreement and Terms and Conditions.

2. Our Website

- 2.1. This Privacy Policy relates to Squared Financial Website, hosted at <https://www.squaredfinancial.com/> (hereinafter referred to as the “**Website**”) and the SquaredFinancial mobile application (the “**Mobile App**”).
- 2.2. The Website, is an informational website about our Company’s vision and goals, exhibiting at the same time our Company’s services and products.
- 2.3. Throughout our Website and Mobile App we may link you to other websites, owned and operated by certain trusted third parties and partners. These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

3. What Information We Collect

- 3.1. We collect personal information about you when you access our Website and Mobile App.
- 3.2. If you decide to apply to open an account with us and hence become our client there is certain information that we will require from you in order to do so.
- 3.3. We may collect your personal data directly from you (through your completed Account Opening Application Form or in any other direct way) or from other persons including, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers.
- 3.4. We may also collect your personal data in regard to your use of our website(s) and Mobile App, such as pages visited, frequency, duration of visit and trading activities.
- 3.5. From time to time, we may also request further information to help us improve our service provided to you (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 in order to comply with applicable regulations.
- 3.6. We collect personal information from you either directly, such as when you contact us via our contact us

- 3.7. The personal information we collect about you, depends on the particular activities carried out through our Website and Mobile App.
- 3.8. This information include cookies (hereinafter referred to as “**Cookies**”) and/or the below personal information, which are being collected when you are trying to connect with us via our ‘**contact us form**’ through our Website::
- a. First Name;
 - b. Last Name;
 - c. Email address; and
 - d. Phone number.

And/or when you decide to **open an account** with us:

- a. First Name;
- b. Last Name;
- c. Country of residence;
- d. Phone number;
- e. Email address;
- f. Dat of Birth;
- g. Nationality;
- h. Residential Address;
- i. Copy of your photo-ID (such as passport, driving license or national ID);
- j. Copy of a recent utility bill/bank statement (or similar) (as evidence of your residential address;
- k. Credit card or bank details;
- l. Employment status (pre-defined list);
- m. Source of funds (pre-defined list);
- n. Range of Net Worth; and
- o. Range of Annual Income;
- p. Trading knowledge and previous experience;
- q. Tax Residence;
- r. Tax Identification Number;

Moreover, we are collecting your email address when you are requesting to be registered to our **newsletter (where applicable)**.

(hereinafter referred to as your “**Personal Information/Data**”)

- 3.9. For the purposes of completing any payments through our Website or Mobile App, you will be redirected to websites and/or platforms of some of our trusted third party service providers for checkout purposes. These other third-party websites and/or platforms may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites and/or platforms, please consult their privacy policies as appropriate.

4. Purpose of the collection

- 4.1. The purpose of collecting **Cookies** is in order to:
- 4.1.1. enable the smooth operation of our Website in general and provide you with constant, uninterrupted and error-free access to our Website;
 - 4.1.2. monitor how effective and popular our Website is, how to improve it, tailoring it to our visitors and their interests and needs.
- 4.1.2. While the purpose of collecting your **Personal Information** via our '**contact us form**' is to enable us to revert and respond to your request/inquiry.
- 4.1.3. Whereas, the purpose of collecting your Personal Information while **opening an account** with us is to enable us to enter into a contract with you and successfully register you as our client. If it is necessary to use your personal data for any other service you may request whilst using Company's services, we'll tell you how we will use your personal data at the time (probably, with a pop up or email notice) and if there are any additional terms and conditions which will apply. You will be asked to confirm that you agree to these additional terms and conditions before your application can proceed.
- 4.1.4. Your Personal Information (not in the public domain or already possessed by us without a duty of confidentiality) 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 ongoing information or opportunities that 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 (according to the Agreement between us), as applicable.
- 4.1.5. We may also collect and process non-personal, anonymised data for statistical purposes and analysis and to help us provided better services.
- 4.1.6. We do not collect and we do not use any personal information other than that specifically mentioned above, without your explicit consent.
- 4.1.7. This Website **is not** intended to be used by children.
- 4.1.8. We do not use automated decision-making processes or profiling while processing your personal data.

5. Notifications

- 5.1. We may send you information by SMS, push notification, email, or in-app notification about our products, services, and offers we think would be of interest to you.
- 5.2. If you receive email communications from us about the market or your activity on the platform and don't want to in the future, please use the unsubscribe link within the email and we will stop sending

you this information via email. Alternatively, when you are logged into your account you can manage your preferences by going to the “Notifications Settings” tab and selecting the type of notification you would like to receive (email, SMS, push notification, none, etc.). You can change these preferences at any time.

- 5.3. You can review and amend your other marketing preference by going to the “Privacy Settings” under the “My Profile” tab on the Squared Financial Client Portal.

6. Trading Activity on Squared Financial Platform

- 6.1. In order to meet our internal compliance and regulatory obligations, we monitor your trading activity such as the frequency of your trading and number of trades, your monetary activity such as a number of deposits and/or withdrawals, payment methods used, your device information and IP address.

7. Personalization of Information

- 7.1. We collect and use personal data, such as your location, trading history, and alike to deliver tailored content such as news, research, reports, and business information and to personalize your experience with Squared Financial services

8. Contacting you

- 8.1. 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, fax, email, or post.
- 8.2. If you agree, we or any of our Affiliates of the Company may contact you from time to time, by telephone, fax, email, or post for marketing purposes to bring to your attention products or services that may be of interest to you or to conduct market research.
- 8.3. When contacting us, you may be requested to provide some personal data, like your name, email address, and residential address to verify your identity and respond to your query.

9. Our legal basis for processing your personal information

- 9.1. When we use Cookies and/or your Personal Information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely on, depending on what personal information we process and why.
- 9.2. The legal bases we may rely on include:
- 9.2.1. **Consent:** where you have given clear consent for us to process your Personal Information for a specific purpose, such as when you are submitting a request/inquiry via our ‘**contact us form**’ or when you **opt-in to our newsletter** or when you **enable analytic cookies** on our Website;
- 9.2.2. **Performance of Contract:** when you are **registering/opening an account with us** we are obliged to perform our obligation under our agreement to proceed your request.

9.2.3. **Legitimate interests:** where the use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information, which overrides our legitimate interests), such as ensuring website and user security, improving user's experience, user interface design and overall performance of the website, i.e. **strictly necessary cookies** and/or *where needed*, to **establishment, exercise or defense legal claims, disputes and judicial investigations**.

10. Cookies and other tracking technologies

- 10.1. A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device), when you use our Website. We use Cookies on our Website. These help us, amongst other things, to recognize you and your device and store some information about your preferences or past actions.
- 10.2. For further information on cookies, our use of 'cookies' and/or on relevant similar technologies, please see our Cookie Policy available on the Company's website.

11. How we Keep your Data

- 11.1. We process your personal information at our offices, in Limassol, and then we are using third party service provider, located in the United Kingdom, for the platform's data, in the European Union on Azure, for CRM's data, and in Germany, for the back office data, where the information is safely kept and stored.
- 11.2. For the storage and security of your personal data the Company takes all the necessary technical and organizational measures to ensure that the processing is carried out in accordance with the applicable local laws and the GDPR (access control, firewalls, antivirus, cryptography, etc.).

12. Data Recipients

- 12.1. Within our Company, your personal data is only accessible by the strictly required personnel and only for the purposes mentioned above.
- 12.2. We limit access of your Personal Information only to those employees or partners that need to know the information in order to enable the carrying out of the Agreement between us. All Company's employees and/or partners who have access to, or associated with the processing of your Information, are contractually obliged to respect the confidentiality of your Information and abide by the privacy standards we have established.
- 12.3. Outside our Company, recipients of your personal data may be any subcontractors or third parties who cooperate and/or provide services in the context of its business, such as companies that provide email services, web hosting services, information technology services, legal representatives, event hosting etc. **Some** of our trusted third party service provides who may be recipient of your personal data are:

- a. Google Analytics (Google Inc);
- b. Aspidе Technologies Limited (Cyprus);
- c. Equinix (UK) Limited (United Kingdom); and
- d. Azure (European Union).

12.4. We choose our associates very carefully, after the necessary checks have been carried out and sufficient guarantees have been provided to implement appropriate technical and organizational measures in such manner that processing will meet the requirements of the GDPR and the relevant laws and ensure the protection of your rights.

12.5. We may also need to:

12.5.1. disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;

12.5.2. share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring. Your information in such cases will be anonymized, but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

12.6. If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

13. Retention & Disclosure of Personal Information

13.1. Personal data provided to us via our Website or Mobile App will only be stored until the purpose for which they were processed has been fulfilled or – in the case of consent – until you withdraw your consent.

13.2. Insofar as retention periods under commercial and tax law must be observed, the storage period for certain data can be up to 7 years. However, storage periods may also be amended due to our legitimate interest (e.g. to guarantee data security, to prevent misuse or to prosecute criminal offenders).

13.3. After this period, your personal data will be irreparably destroyed. Any data kept by us for marketing and information purposes, if applicable, will be retained until you inform us that you no longer wish to receive such information.

13.4. Under the Agreement between us, we have the right to retain and disclose your Personal Information (including recordings and documents of a confidential nature, card details) in certain circumstances and as we believe to be necessary or appropriate. According to the Agreement between us, Your Personal Information may be retained and disclosed:

13.4.1. In order to comply with our obligations deriving from the applicable laws and regulations, which may include laws and regulations outside your country of residence;

13.4.2. where required by law or a court order by a competent Court;

- 13.4.3. where requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory, public and government authority having control or jurisdiction over us or you or our associates or in whose territory we have Clients or Providers, as applicable from time to time;
- 13.4.4. to relevant authorities to investigate or prevent fraud, money laundering or any other illegal activity.
- 13.4.5. a Broker so as to execute your Instructions or Orders and for purposes ancillary to the provision of our services to you as our Client;
- 13.4.6. to carry out anti-money laundering, sanctions or Know Your Customer checks as required by applicable laws and regulations;
- 13.4.7. 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;
- 13.4.8. 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;
- 13.4.9. 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 Information or get in touch with you or improve the provision of our services or activities under the Agreement between us;
- 13.4.10. to data reporting service providers;
- 13.4.11. 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;
- 13.4.12. to market research call centers that provide telephone or email surveys with the purpose of improving our services or activities, but only contact details;
- 13.4.13. 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;
- 13.4.14. at your request or with your consent;
- 13.4.15. to our affiliates;
- 13.4.16. to our employees so as 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.

- 13.5. The Company may also be required to use and retain personal data after you have closed your Squared Financial account for legal, regulatory and compliance purposes, such as the prevention, detection or investigation of a crime; loss; prevention; or fraud prevention.
- 13.6. Any requests for further information in relation to the continued processing of specific data and requests for destruction of data should be made to dpo@squaredfinancial.eu.

14. Transfers of data outside the EU / EEA

- 14.1. We are transferring your Personal Information outside the European union, specifically to a trusted third party service provider of the Company based in the United Kingdom (reference is made in clause 12.3 above). For data transfers outside the EU/EEA we ensure before forwarding the data that, outside of legally permitted exceptional cases pertaining to the recipient, either an appropriate level of data protection exists (e.g. through an adequacy decision of the European Commission, through suitable guarantees, or through the agreement of EU standard contractual clauses between us and the recipient), or your sufficient consent exists.

15. Security

- 15.1. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. These measures include, but are not limited to, access control, internal audit etc. Furthermore, we limit access to your personal information to those who have a genuine business and need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.
- 15.2. While we will use all reasonable efforts to safeguard your Personal Information, 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..

16. Your Rights

- 16.1. As a data subject, you may contact us at any time to make use of your rights, which are, the right to:
- 16.1.1. receive information about the data processing and a copy of the processed data;
 - 16.1.2. demand the rectification of inaccurate data or the completion of incomplete data;
 - 16.1.3. demand the erasure of personal data;
 - 16.1.4. demand the restriction of the data processing;
 - 16.1.5. receive the personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmittance of these data to another controller in certain situations;
 - 16.1.6. object to the data processing;
 - 16.1.7. withdraw a given consent at any time to stop a data processing that is based on your consent;

- 16.1.8. complain to a competent supervisory authority.
- 16.2. In response to such requests, we reserve the right to require the individual making the request to provide certain details about herself/himself so that we can validate that the individual is indeed the person whom the data refers to. We are required to respond to the request of the individual within 30 days and we will endeavour to do so wherever possible. We reserve the right to charge a reasonable fee to cover any expenses that may arise from the request.
- 16.3. In cases a data subject chooses not to provide any personal data, or where any of the rights set out above are exercised to limit the processing of personal data, we may be unable to provide relevant services, or there may be restrictions on the services which can be provided.
- 16.4. Further, as per the GDPR, your right to erasure can also be lifted to the extent that processing is necessary:
- 16.4.1. for exercising the right of freedom of expression and information.
 - 16.4.2. for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject;
 - 16.4.3. for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) of the GDPR as well as Article 9(3) of the GDPR;
 - 16.4.4. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR in so far as the right referred to in paragraph 1 of Article 89 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
 - 16.4.5. for the establishment, exercise or defence of legal claims.
- 16.5. For further information on each of those rights, including the circumstances in which they apply, please contact us (see 'How to contact us' below).
- 16.6. In the event that you wish to complain about how we have handled your personal data, you may contact us (see 'How to contact us' below). We will then look into your complaint and work with you to resolve the matter.
- 16.7. If you still feel that your personal data has not been handled appropriately according to the law, you can submit your complaint with the Office of the Commissioner for Personal Data Protection, at Kypranoros 15, Nicosia 1061, Cyprus, Tel. +35722 818456 Email: commissioner@dataprotection.gov.cy.

17. How to Contact Us

- 17.1. You can contact us by post or email if you have any questions about this Privacy Policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.
- 17.2. Our contact details are shown below:

SQUARED FINANCIAL (CY) LIMITED

Postal address: 205, Arch. Makarios Avenue, Victory House, Ground Floor, 3030, Limassol, Cyprus

Email address: dpo@squaredfinancial.eu

Telephone number: +357 22090227

18. Changes to this Privacy Policy

18.1. This Privacy Policy was last updated on 16th of July 2025.

18.2. We may change this Privacy Policy from time to time and when we do so, we will inform you via a notification on our Website or via other means of contact, when this is considered necessary.