PRIVACY POLICY

EXENICO (CY) LTD

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This Privacy Policy (the "**Policy**") sets out the basis on which **EXENICO (CY) LTD (Ex. Grandis Securities Ltd)** (the "**Company**", "**We**", "**Our**") collects and processes personal information received from you or a third party in connection with the Company's services, or collected by the Company through the use of the Company's services or website. It also outlines your rights regarding the processing of your personal data and explains how you can exercise those rights. Please take the time to read and understand this policy.

We are committed to protecting your personal data and privacy in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR), the Cyprus Data Protection Law 125(I)/2018, and all applicable regulatory obligations imposed by the Cyprus Securities and Exchange Commission (CySEC) under the Investment Services and Activities and Regulated Markets Law 87(I)/2017, as amended and the Prevention and Suppression of Money Laundering and Terrorist Financing Law 188(I)/2007, as amended.

This Policy applies to the processing of data of:

(a) Clients and potential Clients,
(b) Website visitors,
(c) Job applicants.

We may make changes to this Policy from time to time and it is important that you check this Policy on www.exenico.com for any updates. Any personal information we hold will be governed by our most current Policy. If we make important changes to this Policy, we will communicate them to you.

1. Information Collection & Use

We collect several types of information for various purposes to provide our services to you.

Data Collected

Personal Data

"Personal Data" means any information relating to an identified or identifiable natural person. The Company acts as controller in relation to such personal data.

We may collect and process the following categories of personal data when you use our website, apply for our services, become a client or apply for a job position with us:

Website Users:

- Identification and contact information (e.g. name, email, phone number)
- IP address, browser data, device information
- Data collected via cookies (see our Cookies Policy on our website)

Clients and Potential Clients:

- Full name, contact details (email, phone, address)
- Date of birth, nationality, ID documentation (passport, ID card)
- Financial status and transactional data

- AML/KYC documentation (e.g. proof of address, tax residency, TIN)
- Employment details, profession, source of funds and wealth
- Investment profile (knowledge, experience, risk tolerance, investment objectives)
- Recordings of telephone calls and electronic communications (as per MiFID II and CySEC Directive)
- authentication data (e.g., signature)

Once you successfully open a trading account with us, 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 ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

We do not intentionally collect special categories of personal data unless required by law (e.g., politically exposed person (PEP) screening, sanctions and adverse media screening). In such cases, processing will be carried out in compliance with Article 9 of the GDPR.

Job Applicants:

- name, address, phone numbers, date of birth, email address, etc.
- CV and other information gathered during recruitment
- Academic Records
- Work History

We may further ask for other personal information as we may consider necessary for the purpose of recruitment.

Usage Data

We track visitor activity and behaviour at our website every time you access the site and the resulting data allow us to provide more effective user support if you need any help or advice using our website. This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the time and date of your visit on our website etc. Usage data is collected automatically when you visit our Site including through the use of tracking and cookies data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our website and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags and scripts to collect and track information and to improve and analyze our website.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website.

For further information please refer to our Cookies Policy available on www.exenico.com.

2. Legal Grounds for personal Data processing

We process or share your data for the following purposes and under the corresponding legal bases:

Processing Activity	Legal Basis
Account opening & KYC	Legal obligation (AML Law, CySEC Directives)
Transaction monitoring	Legal obligation
Appropriateness Assessment	Legal obligation (MiFID II)
Client communications and account management	Contractual necessity
Compliance with FATCA/CRS reporting	Legal obligation
Marketing communications	Consent / Legitimate interest
Website functionality, analytics, and cookies	Consent (Cookie banner)
Risk management, fraud prevention	Legitimate interest
Internal audits, compliance monitoring	Legal obligation / Legitimate interest
Recruitment processes	Contractual Necessity
Investigate and/or settle disputes	Legitimate Interest
Initiating legal claims, preparing defense in litigation procedures	Legitimate Interest
Corporate restructuring or acquisition by third-party	Legitimate Interest
Recording of communications	Legal obligation (MiFID II) / Legitimate Interest

If we process your personal data for purposes not listed above, we will inform you and seek your consent if required.

All Client information held by us is treated as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes. Information already in the public domain or already in our possession without a duty of confidentiality will not be regarded as confidential.

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.

3. Disclosure of Data

We have the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

(a) where required by law, any applicable rules or regulations or a court order by a competent Court or a request by a competent authority such as CySEC

(b) Where there is a duty to the public to disclose

(c) where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority;

(d) to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; 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;

(e) to a Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR);

(f) to anyone authorised by you;

(g) to any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or provide our services to you (including to payment service providers and/or other financial institutions for the processing of your orders).

4. The safety of your personal data

We take all reasonable measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

The Company implements appropriate technical and organisational measures such as access management procedure, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy etc. Additionally, the Company limits access to the Client's personal data to those employees, agents, contractors and other third parties on a "need to know" basis. They will only process your personal data on the Company's instructions and they are subject to a duty of confidentiality.

Your personal data may be stored electronically or in paper form.

We take the security of your data seriously. However, please note that no method of transmission over the internet or electronic storage is completely secure. While we make every effort to use commercially reasonable measures to protect your personal information, we cannot guarantee its absolute security.

5. Automated decision – making and Profiling

In order to perform the contact between us and as required by Law 87(I)/2017, as amended and the relevant Circulars issued by CySEC, it is requested for the provision of the investment services to you, to assess your knowledge and experience, your financial situation and investment objectives.

We will fulfil the above requirements through the following tools:

Onboarding Questionnaire (including Product Governance Questionnaire) and Fitness Test: these take place when you require registering as client of the Company. Hence, we need to check and ensure that you

fall within the Company's positive target market and that the Company's services and products are appropriate, taking into consideration your categorization, knowledge, financial background and experience in regards to financial services. Based on the results, you will be informed whether you are eligible to receive our services and become our Client. The reason for assessing you is to enable the Company to offer to you services appropriate to you and act in your best interests.

The results above are monitored by the Compliance department of the Company. During these processes, the Company takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure the personal data of the client.

6. How we treat your personal data for marketing activities and whether profiling is used for such activities

We may process your personal data to tell you about products, services and offers that may be of interest to you or your business.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services. 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. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by emailing **dpo@exenico.com**

7. How long we store your personal data for

We will only retain your personal data for as long as we reasonably require it for legal or business purposes subject to a minimum of five (5) years. In determining data retention periods, we take into account local laws, contractual obligations and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it.

For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five (5) years after our business relationship with you has ended, and up to seven (7) years where requested by our Regulators.

Where 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.

8. Transfers of personal data to third countries

Copies of your agreement with us may be transferred to and stored at banking institutions in a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that where we carry out such transfers this will be made subject to applicable laws and where required subject to the appropriate safeguards. You may contact the Company in order to be informed of the appropriate or suitable safeguards (as the case may be).

When we transfer your data to other third parties outside the EEA such transfers will comply with the General Data Protection Regulation (Regulation EU 2016/679), and hence we may in some cases rely on a Commission Adequacy decision (including the EU-US Data Privacy Framework), or appropriate safeguards (e.g. applicable standard contractual clauses, binding corporate rules or any other equivalent applicable arrangements) or other grounds provided by the GDPR.

You may contact the Company in order to be informed of the appropriate or suitable safeguards.

9. Your rights as a data subject

Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.

Right of rectification – you have a right to request from us to correct the personal data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation under Cypriot or EU law), the Company acting as your controller will erase your personal data from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply, the Company will transfer your personal data to another organisation.

Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that

this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

In respect to the aforementioned rights, we will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data. You can send the relevant request to dpo@exenico.com

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

10. Restriction of responsibility

The Company is not responsible for the privacy policies, use of data or the content of sites to which the Company's website links and has no control of the use or protection of information provided by the clients or collected by those sites.

The Company shall not be liable for information provided by the client to any linked websites which are not operated by the Company. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

11. Contacting us about this Policy or making a complaint

If you have any queries about the contents of this Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

E-mail: dpo@exenico.com

We will respond to your request within a month. In case that your request takes us longer than one month, we will inform you within one month of receipt of your request, together with the reasons for the delay; this period may be extended by two further months. In this respect it should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. Nonetheless, where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either:

(a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or

(b) refuse to act on the request.

If you are not satisfied with our response to your complaint and/or your request was not handled within the timeframes specified, you have the right to lodge a complaint with our supervisory authority, the Cyprus Data Protection Commissioner.

Alternatively, you also have the right to lodge a complaint with the data protection authority of your country of residence.

You can find information about how to contact the Cyprus Data Protection Commissioner on the following website: http://www.dataprotection.gov.cy

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