

A low-angle, upward-looking photograph of several modern skyscrapers with glass facades, set against a clear blue sky. The perspective creates a sense of height and architectural grandeur.

# PRIVACY POLICY

## 1. Introduction

Vstar& Soho Markets Limited (hereinafter "the Company"), is authorized and regulated by the Cyprus Securities and Exchange Commission ("CySEC") to act as a Cyprus Investment Firm ("CIF") with License Number 409/22

The Company operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 87(I)/2017-2021, as amended from time to time.

As part of our daily business operations, we need to collect personal information from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services, as well as when providing them with the respective information.

We understand the importance of maintaining the confidentiality and privacy of Your Information. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of Your Information.

By accessing our Company's website including using any of the communication channels to contact us, we consider that you have read, understood and accepted the terms of this Privacy Policy and how we process any information you disclose to us. Moreover, you agree that this Policy, including any amendments will govern how we collect, store, use, share and in any other form process your personal data and your rights during our relationship and after its termination. The information contain herein supersedes any information in relation to the processing of personal data that is included in any of the existing Agreements/Client Agreement and associated forms on matters that are covered by this Privacy Policy. The Company may revise or update this policy from time to time. The new version of this Policy will be available on the Company's website

## 2. Commitment

Vstar& Soho Markets Limited respects the privacy of any user that accesses its website(s). We are therefore committed in taking all reasonable steps in safeguarding the personal data of any existing or prospective clients, applicants and visitors. The Company is committed to safeguard the confidentiality of your personal information or data it collects, uses and/or holds in accordance with the applicable data protection laws and regulations and particularly, the provisions of the European General Data Protection Regulation (GDPR) EU 2016/679 and any subsequent regulations or laws adopted by the Republic of Cyprus with reference to the GDPR (hereinafter 'Data Protection Laws').

## 3. Data Protection Officer

We have appointed a Data Protection Officer ("DPO"). Our DPO has a number of important responsibilities including but not limited to:

- a. Monitoring Vstar& Soho Markets Limited compliance with the provisions of the GDPR;
- b. Raising awareness of data protection issues, training Vstar& Soho Markets Limited staff and conducting internal audits; and
- c. Cooperating with the supervisory authority.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please send us an email at: [info@sohomarkets.eu](mailto:info@sohomarkets.eu) .

## 4. Information we Collect

The Company shall comply with its legal obligations under the AML Law (Law 22(I)/2021), as amended, and CySEC Directive regarding the prevention and suppression of Money Laundering and Terrorist Financing, for the establishment on the Client's economic profile and prevention of money-laundering as well as abide with the relevant record keeping obligations under the European Commission Delegated Regulation regarding organisational requirements and

operating conditions for investment firms and Law 87(I)/2017-2021 for establishing the suitability and appropriateness of each Client based on the services offered by each CIF and recordings of telephone conversations, client transactions, FATCA and CRS.

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

- Personal information you provide to us on applications and other forms, include but are not limited to your first and last name, email, country and city of residence, phone number, social media profile details, IP address, nationality, tax identification number, date of birth, residential address, bank details, financial situation, employment status, trading activity, transaction history, account balance information (“Personal data”);
- We are also required by law to collect certain Know Your Client (“KYC”) documentation in order to verify your identity. KYC documents may include but are not limited to documents that you provide to us to verify your identity, such as your passport/identity card, utility bills and/or bank statement or your company incorporation details.
- We may also collect indirect information from you, which we use purely for verification, security or purely for browsing/ functionality purposes. Such information may include your (IP) address, browser type, operating system, Internet service provider (ISP), cookies. IP address.

The Company is obligated by the regulations of Cyprus Securities and Exchange Commission to keep your Personal Data on record for a period of five years which is calculated after the execution of the transactions or the termination of the business relationship or even longer if it is requested by the CySEC.

## 5. Purpose for which we will collect your personal data

The Company will process, use, store and handle your Personal Data in accordance with the General data Protection Regulation 2016/679 and the Processing of Personal Data (Protection of the Individual) Law of 2018, as amended or replaced from time to time.

We collect, use, disclose, store and process your personal data for the performance of our services as required by law. We use your personal data to provide you with the services you request through our Website and Platform so as to perform our contractual obligations related to those services.

We also collect your personal data for internal purposes including the improvement of= customer experience, promotional and marketing services (e.g. emails, social media, SMS), customer care, training purposes and administration matters. Such data is safely stored via physical or electronic means and procedural controls, and it is treated CONFIDENTIAL. We only collect personal data that is adequate and relevant for the purposes of our business and for a reasonable period of time as required by law. We never ask for more information that is required by law.

The Company needs to comply with the Anti-money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also, the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept so as the Company is able to demonstrate to the regulator that it has acted in accordance with the legislation.

We will process your Personal Data to enable us:

- to verify your identity in order to comply with the current Cypriot and European AML legislations, and with the obligations we have towards CySEC to perform the obligatory KYC verifications and compliance procedures.
- to establish your trading account, issue you an account number and a secure password, maintain your account activity and contact you with account information, among other reasons. This information also helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.
- to provide our services to you and enable you to use them;
- to manage and administer the website and platform;

- to send you newsletters and other relevant and targeted promotional communications;
- to notify you of changes we have made or plan to make to the Website and / or platform;
- to send you emails as necessary;
- to request feedback from you on any transaction effected by you through our platform;
- to deal with enquiries, complaints and feedback from you and our service providers;
- to provide third parties with statistical anonymized information about our users;
- to analyze and improve the services offered on the Website

The Company will ask for the Client's consent in regards to the provision of marketing information in relation to the products and services offered. The Client consent is provided by signing the Client agreement between the contractual parties. The Client may withdraw such consent at any given time by sending an email to [info@sohomarkets.eu](mailto:info@sohomarkets.eu) . The Company shall not disclose to a third party any of its clients' confidential information unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

## 6. Your legal right

You have the right to information which includes among others, where personal data is stored, how the data was collected, and for what purpose. You also have the right to access your personal data. If you wish to receive a copy of the personal data we hold about you, we will give you such copy upon receiving a written request by you, unless any relevant legal requirement prevents us from doing so. Please note that we may need to request specific information from you or contact you to ask for further information to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

### a. Information and Access

You have the right to request access to your personal Data and if so, to be provided with a copy of that Data.

**b. Rectification**

You have the right to request correction of Personal Data in order to correct or complete the provided Personal Data.

**c. Right to Deletion**

You can request to delete/remove your Personal Data (“right to be forgotten”) under certain circumstances, and for instance if you withdraw your consent. However, we may not always be able to comply with your request of erasure due to specific legal reasons and we will notify you, if applicable, at the time of your request.

**d. Processing Restriction**

You can request from the Company to restrict the processing of your Personal Data if it is not accurate, if it has been used unlawfully or if it is not relevant anymore but you wish not to be deleted for any reason and waiting for the Company’s confirmation to stop using your Personal Data.

**e. Right to portability**

You can request to obtain your Personal Data in a readable format. Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: [info@sohomarkets.eu](mailto:info@sohomarkets.eu)

**f. Right to Stop Processing**

You can request from the Company to stop processing his/her Personal Data, and the Company will do so if a) the Company cannot demonstrate compelling legitimate grounds for the processing or b) the Company is processing Client’s Personal Data for marketing purposes.

**g. Right to Withdraw Consent**

You can withdraw your consent at any time in situations where we are relying on your consent to process your Personal Data, and in those instances if you withdraw your consent, we may not be able to provide you with our services. We will advise you if this is the case at the time you withdraw your consent.



#### **h. Right to complain**

If you have grounds to believe that the Company does not appropriately use your Personal Data, you can submit a complaint to the Office of the Commissioner for Personal Data Protection. The Client can exercise any of the above rights by contacting the Company through email at [info@sohomarkets.eu](mailto:info@sohomarkets.eu) or by post at postal address.....

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

If you are not satisfied with our response or believe we are not processing your Personal Data in accordance with the law, you can submit your complain to the Data Protection regulator in your jurisdiction. The Office of the Commissioner for Personal Data Protection in Cyprus details are below:

Address: 1 Iasonos str.,1082 Nicosia, P.O.Box 23378, 1682

Website: <http://www.dataprotection.gov.cy/>

Telephone number: +357 22818456

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

### **7. Management of personal information**

The Company respects the privacy of any users who access its website(s), and it is therefore committed to taking all reasonable steps to safeguard any existing or prospective clients, applicants and website visitors rights.

The Company keeps any Personal Data of its clients and potential clients in accordance with the applicable data protection laws and regulations.



We may be required to retain and use personal data to meet our legal requirements, for data security purposes and as we believe to be necessary or appropriate in order to: (a) comply with our obligations under applicable law and regulations, (b) respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and governmental authorities, (c) monitor compliance and enforce our Platform terms and conditions; (d) carry out anti-money laundering procedures, sanctions or KYC checks as required by applicable laws and regulations; and (e) protect our rights, privacy, safety, property, or those of other persons.

We have appointed a Data Protection Officer to ensure that the management of personal information is compliant with the applicable data protection laws and regulations and in accordance with this Privacy Policy.

## **8. Transfer Data outside of EEA**

The Company's aim is to safeguard Personal Data when these are to be transferred outside the European Economic Area. According to the GDPR, Personal Data can be transferred outside the European Economic Area if adequate protective measures are established, appropriate to the safeguards dictated by Data Protection Laws.

The Company takes appropriate protective measures when Personal Data are disclosed to a third party. The third parties that the Company may transmit Personal Data to shall comply with the GDPR or the equivalent legislation in their jurisdictions.

You agree to the transfer and/or processing of your Personal Data outside the European Economic Area, as described in this section, by providing us with your Personal Data during the account opening process and for the maintenance of your account with the Company.

## **9. Disclosure of your Personal Data**

Except to the extent required by any applicable law or governmental or judicial body, we will only disclose such of your personal data to our third-party companies as is required for us or them to perform our or their services to you.

Except as described above, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without your prior explicit consent.

We will use all reasonable endeavors to ensure that any companies to whom we disclose your confidential information is compliant with the GDPR (or an equivalent standard) as regards its use and storage of your Personal Data.

In the event that we sell or buy any business or assets, we may disclose your personal data and transaction data to the prospective seller or buyer of such business or assets. If substantially all of the assets of the Company are acquired by a third party, personal data and transaction data held by it about its customers will be one of the transferred assets.

We will disclose your Personal Data if we are under a duty to disclose or share your personal data and transaction data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

If at any time you wish us to stop processing your Personal Data for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so, to the extent we are permitted by law. Please note that this may mean that your Account will be closed. You may contact us at [info@sohomarkets.eu](mailto:info@sohomarkets.eu)

As part of using your personal information for the purpose set put above, we may disclose your information to:

- Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services.
- Partners or Tied Agents with whom the Company has closed relationships and who are exclusively working for the Company.
- Regulatory Authorities and Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.

- Anyone authorized by you.
- Trade Repository or similar.
- The Company's 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.

The Company requires from organizations outside the Company who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy policy.

## 10. Data Security

Safeguarding the privacy of your information and data protection is of utmost importance to us whether you interact with us personally, by phone, by mail, over the internet or over any other electronic medium is stored on our secure servers, and where it is protected by our comprehensive, modern, and well-maintained data security infrastructure.

We protect your information by using data security technology that includes, but is not limited to such systems as firewalls, encryption, access controls, physical security, physical and logical network separation, technology audit tools and appropriately administered and monitored internal roles and procedures.

Unfortunately, the transmission of information via the Internet is not completely secure. We will take all reasonable steps to ensure that your personal data are kept secure and protected in accordance with our legal obligations and standards. If this is not possible, for example because we are required by law to disclose data, we will ensure that the sharing of such data is lawful.

## 11. Data retention

The Company needs to comply with the Anti-Money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also, the measures that are taken by the Company in regards to your identity verification, source of income and wealth,

monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept so as the Company is able to demonstrate to the regulator that it has acted in accordance with the legislation. We will retain your personal data for a period of time as we deem necessary for legal and/or business purposes subject to a maximum of seven years upon the end of our business relationship. Your personal data will be securely deleted and/or destroyed when no longer needed.

## 12. Cookies

We collect browser and cookie information when you first navigate to our websites. We use cookies to give you a better customer experience and for use of access. Certain cookies will allow you to leave and re-enter our Websites without re-entering your password. This will be monitored by a web server. For more information on the use of cookies and how you can control their use, please refer to our Cookies Policy

If you register with us or if you continue to use the Website, you agree to our use of cookies.

You further agree to use the Website and our services only for lawful purposes.

From time to time you may find links to third party websites on the Website. These links are provided for your information only and are not recommended by [www.sohomarkets.eu](http://www.sohomarkets.eu) .

## 13. Marketing

We may collect personal Information through social media sites when you interact with us on one of our social channels, via our Apps or/and from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are connected on social media platforms, as well as from other third parties. We may send you information by SMS, push notification, email, in-app notification or contact you by telephone or by any other means to provide you with information about our products, services, training and offers we think would be of interest to you. If you receive email communications from us about the market or your activity on the platform and don't want to in the future, you may opt out by clicking the

unsubscribe link situated at the end of each email sent to you or by notifying the member of staff that contacted you and we will stop sending you this information. If you have any further questions, please do not hesitate to contact us by email at [info@sohomarkets.eu](mailto:info@sohomarkets.eu) .

#### **14. Changes to Privacy Policy**

The Company reserves the right to change or amend the Privacy policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this policy, we will notify you by email or by means of a notice on our home page or by changing the version of the document including the date of the update which will be visible to the first page of this document. The latest and prevailing version of this Policy will at all times be available at [www.sohomarkets.eu](http://www.sohomarkets.eu) . Any revised Policy will be immediately effective upon posting on our Web Site.

#### **15. Communication with the Company**

You may exercise any of the above rights by contacting the Company's Data Protection Officer as follows:

- By sending an email to: [info@sohomarkets.eu](mailto:info@sohomarkets.eu) or
- By post at postal address Spyrou Kyprianou 41 Avenue, Steratzias Court 2, 1st Floor, Flat 101, 4003, Mesa Geitonia, Limassol, Cyprus