

PRIVACY POLICY

Reviewed by: CO
Approved by BoD: 04.08.2025
Date of next review: 01.08.2026

1. INTRODUCTION

Wisdompoint Capital Ltd (hereinafter referred to as the “Company”) is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 219/13, obtained on 30/10/2013. The Company’s registered office is located at 1 Andrea Zappa Street, Office 9, Limassol, 4040, Cyprus.

In accordance with Article 24 of the General Data Protection Regulation (EU) 2016/679 (“GDPR”), and taking into account the nature, scope, context, and purposes of processing, as well as the risks to the rights and freedoms of natural persons, the Company has implemented appropriate technical and organizational measures to ensure compliance with the GDPR, as may be amended from time to time.

This Privacy Policy has been prepared in line with the requirements of the GDPR. It describes the categories of personal data the Company collects about its clients, how such data is used, with whom it may be shared, and how it is safeguarded. It also explains the rights of clients in relation to the Company’s processing of their personal information and the procedures to exercise such rights.

By opening a trading account with the Company, the client expressly consents to the collection, processing, storage, and use of personal information by the Company, as outlined in this Privacy Policy.

2. THE COLLECTION OF PERSONAL INFORMATION

The Company collects the information necessary to open a client’s trading account, perform transactions, safeguard the client’s assets and privacy, and provide the client with the requested services. In this respect, the Company gathers information from (prospective) clients and may, in certain circumstances, gather information from banks, credit agencies, clearing agencies, fraud prevention agencies, and other sources. This information assists the Company in constructing the client’s profile based on the client’s requirements and preferences, in order to provide the Company’s services effectively.

The Company uses a sophisticated commercial database which allows continuous screening of clients to identify individuals and companies that appear as politically exposed persons (PEPs) or are suspected or convicted of money laundering, terrorism financing, drug trafficking, and other illicit activities within business relationships. Information is aggregated from relevant sanction and embargo lists, from over 600

enforcement agencies, from numerous court cases, and from other open-source intelligence resources worldwide.

When the client accesses or uses the Company's services, the Company automatically collects information about the client, including:

- **Log Information:** The Company collects log information about the client's use of the services, including the type of browser used, app version, access times, pages viewed, the client's IP address, other network identifiers, and the page visited before navigating to the Company's services.
- **Device Information:** The Company collects information about the computer or mobile device used to access the Company's services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Activities on the Site:** The Company collects records of activities on the site, including any content posted by the client, client account details, the time, value and currency of any deposit, withdrawal, or transaction made, and the payment method used.
- **Location Information:** In accordance with the client's device permissions, the Company may collect information about the precise location of the client's device.
- **Information Collected by Cookies and Other Tracking Technologies:** The Company uses different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on the client's hard drive or in device memory that help the Company improve the services and the client's experience, see which areas and features of the services are popular, and count visits. Web beacons are electronic images that may be used in the services or emails to help deliver cookies, count visits, and understand usage and campaign effectiveness.

3. 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. Such information will not be disclosed to any third party except under the circumstances described in the sections below.

4. DISCLOSURE OF INFORMATION TO PARTNERS

The Company may share information with affiliates or partners when such information is reasonably required to perform Know Your Customer (KYC) checks or to provide products or services to the client. The Company may also share information with partners to offer additional similar products and services that meet the client's needs and are delivered in a relevant and useful manner, but only where the client has authorized the Company to do so.

5. DISCLOSURE OF INFORMATION TO NON-AFFILIATED THIRD PARTIES

The Company does not sell, license, lease, or otherwise disclose the client's personal information to third parties, except as described below:

- Where required by law or by a court order of a competent court; if such disclosure is mandated by law or by a regulatory authority, it will be made on a strictly "need-to-know" basis, unless otherwise instructed by the regulatory authority.



- Where requested by CySEC or any other regulatory authority having jurisdiction over the Company or the client, or their associates, or in whose territory the Company has clients.
- To relevant authorities for the investigation or prevention of fraud, money laundering, or other illegal activities.
- To the extent reasonably required for the execution of orders and for purposes ancillary to the provision of services.
- To credit reference and fraud prevention agencies, authentication service providers, banks, and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, or identification and due diligence checks of the client. Such agencies may check the details supplied by the client against databases (public or otherwise) accessible to them. They may also use the client's details in the future to assist other companies for verification purposes. A record of such searches will be retained by the Company.
- To payment service providers and banks/credit institutions processing the client's transactions.
- To the Company's professional advisors and auditors, provided that in each case the relevant professional is informed of the confidential nature of the information and commits to confidentiality obligations.
- To service providers who create, maintain, or process databases (whether electronic or otherwise), or who provide record-keeping, email transmission, messaging, or similar services, assisting the Company in collecting, storing, processing, and using client information, contacting the client, or improving the provision of services under this Agreement.
- To third parties engaged by the Company to carry out certain internal functions, such as account processing, fulfillment, client service, or other data collection activities relevant to the Company's business.
- To credit reporting or collection agencies, as reasonably required to provide services to the Company and/or the client.
- To a Trade Repository or similar entity under Regulation (EU) No. 648/2012 (EMIR).
- To other service providers for statistical purposes in order to improve the Company's marketing; in such cases, data will be provided only in aggregate form.
- To market research call centres conducting telephone or electronic surveys to improve the Company's services; in such cases, only contact details are shared.
- Where necessary for the Company to defend or exercise its legal rights before a court, tribunal, arbitrator, Ombudsman, or governmental authority.
- At the client's request or with the client's consent.
- To permitted successors, assignees, transferees, or buyers, with fifteen (15) business days' prior written notice to the client.
- Where the client is a U.S. taxpayer, to the Inland Revenue in Cyprus, which in turn reports such information to the U.S. Internal Revenue Service (IRS) under FATCA and the relevant intergovernmental agreement.
- Where the client is tax resident outside Cyprus, in compliance with the OECD Common Reporting Standard (CRS). In such cases, the Company may be legally obliged to provide information on the client's financial accounts to the Cyprus tax authorities, which may exchange this information with

tax authorities in other jurisdictions under intergovernmental agreements. The Company will expressly inform the third party of the confidential nature of the information.

The use of any shared information is strictly limited to the purposes described above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such information in accordance with applicable legislation and the relevant agreement signed with the Company, and in a manner consistent with the Company's own standards of protection. The Company will not share personal information with any third party that the Company considers unable to provide the required level of protection for the client.

6. THE SAFETY OF THE CLIENTS PERSONAL DATA

The Company takes appropriate measures to ensure a level of security suitable to protect any personal data provided by the Client from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.

The Company implements technical and organizational measures such as data encryption, access management procedures, clean desk policy, business continuity and disaster recovery planning, IT systems risk assessment, physical and logical access segregation, and a personal data breach response process. The Company limits access to the Client's personal data to employees, agents, contractors, and other third parties who have a legitimate business need to know. These parties process the Client's personal data only on the Company's instructions and are subject to strict confidentiality obligations.

The Client's personal data may be stored electronically or in paper form.

7. AUTOMATED DECISION – MAKING AND PROFILING

In order to perform the contract between the Company and the Client, and as required by Law 87(I)/2017 and relevant Circulars issued by CySEC, the Company must assess the Client's knowledge and experience, financial situation, and investment objectives.

The Company fulfills these requirements through the Onboarding Questionnaire, which is completed when the Client registers with the Company. The Company must ensure that the Client falls within the Company's positive target market and that the Company's services and products are appropriate, taking into consideration the Client's categorization, knowledge, financial background, and experience in relation to financial services. Based on the results, the Client will be informed whether the Client is eligible to receive the Company's services and become a Client of the Company. The purpose of this assessment is to enable the Company to provide services that are suitable and aligned with the Client's best interests.

The results are monitored by the Compliance Department of the Company. During these processes, the Company applies technical and operational measures to correct inaccuracies, minimize errors, prevent discrimination, and secure the Client's personal data.

8. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA")

The Company safeguards personal data if such data is transferred outside the European Union, provided that adequate protective measures are in place in accordance with applicable Data Protection Legislation. The Client may contact the Company to be informed about the appropriate or suitable safeguards.

Third parties receiving such data must comply with Data Protection Laws or equivalent legislation in their jurisdiction. The Company may, in some cases, rely on a Commission adequacy decision, appropriate safeguards (such as standard contractual clauses, binding corporate rules, or other applicable arrangements), or other grounds provided by the GDPR.

By providing consent during the account opening process and submitting the information required to open and maintain an account with the Company, the Client agrees to the transfer and/or processing of personal data outside the EU, as described in this section.

9. RECORDING OF TELEPHONE CONVERSATIONS AND ELECTRONIC COMMUNICATIONS

Telephone conversations and electronic communications between the Client and the Company are recorded and retained by the Company for a period of up to five (5) years, unless a longer period is required by law. These recordings are the sole property of the Company. The Client accepts such recordings as conclusive evidence of the conversations recorded. Recordings shall be provided to the Client upon request.

It is noted that the Company does not currently accept any trading orders via telephone.

10. CONTACT WITH CLIENTS

The Company may use the Client's personal information to contact the Client for the provision of products and services requested by the Client or, where the Client has provided consent, to offer products and services that may be of interest. The Client provides such consent by accepting the Company's terms and conditions during the registration process.

The Client has the right to object at any time to the processing of personal data for marketing purposes, including profiling, by contacting the Company and requesting that no further contact be made. Where the Client has opted out of receiving marketing communications, the Company will retain the Client's details on a suppression list to ensure that no further communications are sent.

11. DATA PROTECTION RIGHTS

To ensure fair and transparent processing of personal data, the Client is entitled to the following rights, as further described in the Company's Data Protection Notice available on the Company's website (www.wisdompointcapital.com):

A. Right of Access

The Client has the right to obtain confirmation from the Company as to whether personal data concerning the Client is being processed and, where that is the case, to access such data and receive additional details regarding the processing.

B. Right of Rectification

The Client has the right to request, without undue delay, the correction of inaccurate personal data and/or the completion of incomplete personal data.

C. Right of Erasure

The Client may request the erasure of personal data, except where the Company is permitted to refuse under lawful bases, including:

- Personal data are no longer required for the purposes for which they were collected.
- Processing was based on the Client's consent and the Client withdraws consent, with no other lawful ground for processing.
- Personal data was processed unlawfully.
- The Company is under a legal obligation to erase personal data.
- The Client objects to the processing of personal data and there are no overriding legitimate grounds for the processing, or the Client objects to processing for direct marketing purposes.

D. Right of Restriction of Processing

The Client may request the restriction of processing where:

- The accuracy of personal data is contested, for a period allowing verification.
- Processing is unlawful and the Client opposes erasure, requesting restriction instead.
- The Company no longer requires the data, but the Client needs it for legal claims.
- The Client has objected to processing pending verification of overriding legitimate grounds.

E. Right of Objection

The Client has the right to object to the processing of personal data at any time, particularly where:

- Processing is based on the Company's legitimate interests or those of a third party, unless overriding legitimate grounds can be demonstrated.
- Personal data is processed for direct marketing purposes, including related profiling. If the Client objects to direct marketing, personal data will no longer be processed for this purpose.

F. Right to Data Portability

The Client has the right to receive personal data provided to the Company in a structured, commonly used, and machine-readable format, and to transmit this data to another controller or request that the Company transfer the data directly, where technically feasible. This right applies where:

- Processing is based on the Client's consent.
- Processing is carried out by automated means.

This right shall not adversely affect the rights and freedoms of others.

G. Right in Relation to Automated Decision-Making and Profiling

The Client has the right to request that decisions concerning the Client not be based solely on automated processing, including profiling, where such decisions significantly affect the Client's legal position or otherwise have a substantial impact.

In exercising these rights, the Client may submit requests to the Company. The Company will respond appropriately and, where applicable, correct, amend, or delete the Client's personal data.

12. USE OF "COOKIES"

The Company uses cookies to enhance the performance of the website (<https://wisdompointcapital.com>)

). Cookies used by the Company do not contain personal or other sensitive information.

The Company may share website usage statistics with reputable advertising companies and with affiliated marketing companies. The information collected by such advertising companies is not personally identifiable. To administer and improve the website, the Company may engage third parties to track and analyze usage and statistical information. These third parties may use cookies to monitor behavior and may set cookies on behalf of the Company. These cookies do not contain personally identifiable information.

13. MAILING LIST

When the Client opens a trading account with the Company, the Client agrees to subscribe to the Company's mailing list in order to receive company news, product updates, and other relevant communications. Where the Client wishes to unsubscribe from the mailing list, the Client must contact the Company (see Section 17).

14. RECORD KEEPING

Under applicable regulations, the Company retains records containing the Client's personal data, trading information, trading account opening documents, communications, and any other information relating to the Client for a minimum of five (5) years after termination of the Agreement. Telephone and electronic communications between the Client and the Company may be retained for a period of up to seven (7) years where required by CySEC.

15. PRIVACY POLICY UPDATES

The Company may update this Privacy Policy from time to time. In the event of a material change, including changes to how personal data is collected, processed, or used, the revised Privacy Policy will be uploaded on the Company's website. The Company will notify existing clients of any new version of the Privacy Policy for further acceptance.

16. HOW TO CONTACT THE COMPANY OR DATA PROTECTION COMMISSIONER

Where the Client has any queries regarding the contents of this Privacy Policy, wishes to inform the Company of a change or correction to personal data, requests a copy of personal data held by the Company, or wishes to raise a complaint or provide comments, the Client may contact the Company's Data Protection Officer or Customer Support Officer.

Contact Details:

Email: customers@wisdompointcapital.com, info@wisdompointcapital.com

Telephone: +357 25 010 750

Address: Andrea Zappa 1, Office 9, 4040, Limassol, Cyprus (Attention: Data Protection Officer)

The Company will respond to requests within five (5) working days. If a request requires more than one month to process, the Company will notify the Client accordingly and provide updates.



Where the Client is not satisfied with the Company's response or where a request has not been handled within the specified timeframes, the Client has the right to lodge a complaint with the Cyprus Data Protection Commissioner.

Contact details of the Commissioner

Email: commissioner@dataprotection.gov.cy

Telephone: +35722818456.

Office Address: Kypranoros 15, 1061 Nicosia, Cyprus

Postal Address: P.O. Box 23378, 1682 Nicosia, Cyprus

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

Alternatively, the Client also has the right to lodge a complaint with the data protection authority of the Client's country of residence.