



Data Privacy Policy

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Our Data Privacy Policy below describes in detail how Lunaro Markets Limited handles the collection, management, and protection of all private and confidential user information.

Introduction

Your privacy is very important to us. We are committed to protecting and respecting your personal data. This Privacy Policy describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

We may make changes to this Notice from time to time and it is important that you check this Notice for any updates. Any personal information we hold will be governed by the current privacy notice at the given time. If we make changes, we consider to be important, we will communicate them to you.

Please note that this notice is addressed to customers and potential customers. If you are an Lunaro Markets Limited employee, a contractor to Lunaro Markets Limited or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us.

Any reference to 'us', 'our', 'we' or 'Lunaro' in this privacy notice is a reference to each group company within the Lunaro Markets Limited as the context requires unless otherwise stated.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

By accessing our websites, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this notice and how we process any information you disclose to us including personal data prior to becoming a client. Once you open an account with us you agree that this notice, 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 business relationship and after its termination.

Purpose of this Privacy Policy

We are committed to being open and transparent about how we use personal information. Where our documents or interactions with you require obtaining your personal information, we will generally state the purposes for its use and to whom it may be disclosed.

Who are we?

This privacy notice applies to the processing activities of the data controller (Lunaro Markets Limited: Lunaro Markets Limited, a company registered in Abu Dhabi Global Markets (ADGM) with registration number (000005466) with registered office at 1009, 10, Al Khatem Tower, ADGM Square, Al Maryah Island, Abu Dhabi, United Arab Emirates and is regulated by the FSRA under FSP number 200034.

We are registered as a Data Controller with the ADGM Office of Data Protection. The ADGM Office of Data Protection is responsible for promoting data protection within ADGM, maintaining the register of Data Controllers, enforcing the obligations upon Data Controllers and upholding the rights of individuals. The ADGM Office of Data Protection is headed by the ADGM Commissioner of Data Protection (the "Commissioner").

What kind of personal information do we collect and store?

As part of our business we collect personal data from customers and potential customers that include the following but not limited to:

- Full name of the Client including any alias;
- Date and place of birth;
- Nationality and dual nationality status;
- Gender;
- Passport;
- US Person Declaration;
- Contact details (telephone number and email address)
- Signature;
- Current residential address and previous address If applicable
- Valid documentary evidence for proof of address (such as utility bills, tenancy contract etc.); and
- Government-issued ID or other proof of their identity.
- Passport copies,
- Driver's license details;
- National identity card details;
- Photograph identification cards

- Biometric – Facial recognition and liveliness check
- Visa information; and
- Bank account information;
- Payment card information;
- Primary account number (PAN);
- Transaction history information;
- Tax information (Taxpayer identification number); and
- Details and proof of income / funds/ wealth – salary certificate, SOA, pay slips for the last 3 months.
- Employment status;
- Name of the employer;
- Office location;
- Job title; and
- Annual income; Source of Income; Source of Wealth
- Completing surveys, although you do not have to respond to them;;
- Information provided to our support team;
- Information shared through public social networking posts;
- Authentication data;
- Security questions;
- User identification information for Account access;
- Click-stream data; and / or
- Other data collected via cookies and similar technologies; and
- We shall collect data on any association with known or suspected criminal individuals, entities or events;
- Data relating to the perceived risk of an individual being involved with crime; and
- Other personal data necessary for purposes of the prevention of fraud, misuse of services, or money laundering, or the prevention or detection of crime.
- Location data
- Political Affiliation or Politically Exposed Person Knowledge and experience in trading, risk tolerance and risk profile
- IP address, device specifications and other information relating to your trading experience
- Correspondence
- Details of your visits to our website or our Apps including, but not limited to, traffic data, location data, weblogs and other communication data.

We use cookies to store and collect information about your use of our website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our website. These cookies enable us

to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our website.

Use of "Cookies"

The Company may use cookies to assess and improve the performance of the Website and its products and services offered to its clients. Cookies are used by most internet browsers and are small pieces of information that use a unique identification tag and are stored on Clients' devices as a result of Clients using the Company's Website or other services the Company provides to its clients. Clients may be able to refuse to have cookies stored on their device they may be able to change the setting of their browser to refuse all cookies, and/or have their device notify them each time a cookie is sent to their device. By controlling their cookies in this way may impair the quality of service provided by the Company to its Clients and therefore, it is recommended for Clients to allow cookies on their devices to ensure the best possible experience and quality services provided by the Company. You can control how cookies are placed on your device from within your own browser. You can also delete existing cookies from your browser. However, refusing and/or deleting cookies may mean some sections of our site will not work properly.

We also keep records of your trading behaviour, including a record of:

- Products you trade with us
- Historical data about the trades and investments you have made, including the amount invested
- Your preference for certain types of products and services

We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic, biometric facial recognition, liveliness check and non-photographic documents) to meet the standards set under those laws. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services we provide to you includes:

If you are a corporate client we are required to collect additional information such as corporate documents of address, shareholders, directors, officers including additional personal information on the Shareholders and Directors. We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

We obtain this information in a number of ways through your use of our services and websites, the account opening applications, our demo sign up forms, webinar sign up forms, website

cookies and similar tracking technology built into our Websites and Apps, subscribing to news updates and from information provided in the course of our ongoing relationship.

We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, social media, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our 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.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

Who may we disclose personal information to?

We may share your personal data with other companies within the Lunaro Group where necessary for the provision of services, to meet our legal or regulatory obligations, or for other legitimate business purposes, consistent with applicable data protection laws. Such sharing will always be limited to what is necessary and proportionate, and appropriate safeguards will be applied to protect your information.

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

- other service providers for Lunaro Markets Limited who provide Onboarding, Screening, Trading, financial and other services;
- third party apps providers when you use our apps, communication systems and trading platforms which are provided to us by third parties;
- service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization, financial, regulatory, compliance, insurance, research or other services;
- introducing brokers and affiliates with whom we have a mutual relationship;

- payment service providers and banks processing your transactions; auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; courts, tribunals and applicable regulatory authorities as agreed or authorised by law or our agreement with you
- government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements; anyone authorised by you.

We endeavour to disclose to these third parties only the minimum personal data that is required to process and perform their contractual obligations to us. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us.

Our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

When and how do we obtain your consent?

We may process your personal data for one or more lawful bases of processing ("Lawful Basis") depending on the specific purpose for which we are using your data.

The Lawful basis are the following:

- to perform our contractual obligations towards you
- to be compliant with the legal and regulatory requirements
- to pursue our legitimate interests

Where our use of your personal information does not fall under one of these three Lawful basis we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

We may use personal data provided by you through our website or otherwise and personal data provided during our business relationship to communicate with you for marketing promotional purposes as well as to provide you with market news and analytical reports. The channels used for such communications may include calling you, sending emails, notifications through your online account portal and SMS notifications including push notifications, direct messages via social media platforms (Instagram, LinkedIn, Facebook, You Tube, X and TikTok), WhatsApp messaging application and any other means of medium. You have the right to opt

out by using your online account portal or by sending an email to hello@lunaro.com using the registered email address you disclosed to us, in case you do not have access to your online portal account, or one has not been provided to you for any reason.

By using (collectively, "Using" or "Use") our Website and/or Electronic Trading Services, by registering with us, or by submitting information to us you consent and agree with the terms of this Policy and you hereby give your consent for us to the collect, process, store, use and disclose your personal data whether by the Company or by a third party when it may be required in order to effectively perform.

Services in connection with the Company's Terms and Conditions or effectively execute any related operational function performed by the Company to its Clients (e.g. refunding Clients with their funds) in accordance with this Policy and as explained below herein. If you do not agree with this Privacy Policy, you must not use our website and/or Electronic Trading Services, access our services or submit information to us.

Management of personal information.

We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational 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.

We have appointed a Data Protection Officer to ensure that our management of personal information is in accordance with this privacy notice and the applicable legislation.

We require organizations outside the Lunaro Markets Limited who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all relevant data protection laws and this privacy notice.

In brief, the data protection measures we have in place are the following:

- we train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals
- requiring our employees to use passwords and two-factor authentication when accessing our systems;
- We apply Chinese walls and employees only have access to the personal data required for the purposes of the tasks they handle.
- We apply data encrypting technologies during data transmission during internet transactions and client access codes transmitted across networks

- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- practising a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records; and
- employing physical and electronic means such as access cards, cameras and guards to protect against unauthorised access.

How do we store personal information and for how long?

We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. 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 six years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Personal data provided by you as a prospective client during account opening registration in case the registration was never completed or your account opening application was rejected, will be maintained for six months unless there is a regulatory reason requiring us to keep it for a longer period of time.

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.

The data that we collect from you may be transferred to, and stored at, a destination outside Abu Dhabi Global Markets. It may also be processed by staff operating outside the ADGM who work for us or for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

In the event of transfer of personal data to a recipient located in a jurisdiction outside the country/jurisdiction of operation, Lunaro Markets Limited will ensure that the jurisdiction falls under the category of jurisdictions with adequate level of protection.

The adequacy of the level of protection ensured by laws to which the recipient is subject shall be assessed in the light of all the circumstances surrounding a Personal Data transfer operation or set of Personal Data transfer operations, including, but not limited to:

- a. the nature of the Personal Data;
- b. the purpose and duration of the proposed Processing operation or operations;
- c. if the Personal Data do not emanate from the company's jurisdiction, the country of origin and country of final destination of the Personal Data; and
- d. any relevant laws to which the Recipient is subject, including professional rules and security measures.

Unsolicited Personal Information

Lunaro Markets Limited does not collect sensitive information unless you give us the consent and agree to that or when other exceptions such as regulatory or legal obligations apply. These exceptions may include necessary legal requirements for proper action on suspected illegal activities or serious misconduct.

In the cases stated above if we do not provide the personal information that is requested from us, we may not be able to provide you further with our services or to properly meet your needs.

Lunaro Markets Limited does not allow conducting anonymous business activities or use of pseudonyms regarding its dealing with entities or individuals. This is because it is impractical for Lunaro Markets Limited to handle unidentified entities or individuals. We might be unable to delete your data for legal or regulatory reasons, and we might retain your data for more than 6 years.

If we do this, we will ensure that your privacy is protected and stored accordingly, and it is used only for the purposes mentioned above, and in accordance with applicable data protection rules.

Security

If you are given a password that gives you access to certain parts of our website or Electronic Trading Services, you are responsible for keeping this password safe and confidential. We ask that you do not share your password with anyone.

Transferring information over the Internet is not completely secure, although we will do our utmost to protect your personal data, but we cannot guarantee the security of the data you transmit to our website; Electronic Trading Services; email servers; apps any data transmission is at your own risk. After we receive your information, strict procedures and security features will be used to prevent unauthorized access.

Marketing

We may use your data to provide you with information about our services that may be of interest to you, and we or our agents may contact you by email or phone. For sensitive information, if an individual has agreed to use or disclose it for this purpose, Lunaro Markets Limited may only use the information for direct marketing purposes. You can opt out of our email marketing services at any time by emailing us to hello. You can also ask Lunaro Markets Limited to provide you with a source of information. If such a request is made, Lunaro Markets Limited will notify you of the source of the information for free within a reasonable period.

Links to other websites

The Company's Website and Electronic Trading Services may be linked to other Websites. This Policy is not applicable to those other sites. The Company recommends and encourages Clients to read, understand and familiarize themselves with the privacy policies (if any) available on these other sites. The Company cannot be held responsible or liable for the privacy policies or content of such sites and therefore, has no control over the protection and use of information provided by the Clients on such sites. The Company's Website and Electronic Trading Services may contain hyperlinks to Websites owned and operated by third parties. Where this is the case, we urge you to review the equivalent data protection, privacy, and cookie policies available on such Websites. We do not accept any responsibility or liability for the data protection or privacy practices of third parties in relation to such Websites and your use of third-party Websites is entirely at your own risk.

Your rights:

Please note that you are entitled to the following rights except under exceptional circumstances where they might not apply (refer point e). You are entitled to:

- a. request access to your personal data (commonly known as a "data subject access request");
- b. request correction of the personal data that we hold about you;

- c. request erasure of your personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- d. object to processing of your personal data 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. You also have the right to object where we are processing your personal data for direct marketing purposes.

In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

- e. request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful, but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- f. 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 (i.e. not to hard copies) which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- g. withdraw consent at any time where we are relying on consent to process your personal data.

Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: hello@lunaro.com

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

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.



What if you have a query or a complaint?

If you want to exercise your rights, please contact us by email at hello@lunaro.com using the registered email address you disclosed to us.

We try to respond to all complaints 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 to your complaint, you have the right to lodge a complaint with the office of Data Protection in the ADGM (data.protection@adgm.com)

You can find details about how to do this on the following website:

<https://www.adgm.com/operating-in-adgm/office-of-data-protection/for-individuals>