

# Broker Solutions PRIVACY POLICY

Data protection is of a particularly high priority for JP Holdings LTD., and its brand name (collectively “Broker Solutions”). In this Privacy Policy, we would like to disclose the nature, scope, and purpose of the personal data we collect, use and process.

Furthermore, data subjects are informed, by means of this Privacy Policy of the rights to which they are entitled. This Privacy Policy embodies our commitment to you on protection of your data.

## 1. Definitions

The data protection declaration of Broker Solutions is based on the terms used by the European Union for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration is for the general public, as well as our customers, employees, agents and business partners. In this Privacy Policy, Broker Solutions uses, inter alia, the following terms:

### A. Personal data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### B. Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

### C. Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### D. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

#### E.Controller

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by applicable law, the controller or the specific criteria for its nomination may be provided for by applicable law.

#### F.Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

#### G.Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

#### H.Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

#### I.Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2.Name and Address of the Controller/Processor

The Controller or Processor for the purposes of this Privacy Policy pursuant to the European Union General Data Protection Regulation (EUGDPR) and other data protection laws applicable to Broker Solutions is:

JP Holdings LTD

Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of Marshall Island, MH96960

Company Registration Number 92782

[info@brokersolutions.tech](mailto:info@brokersolutions.tech)

[www.brokersolutions.tech](http://www.brokersolutions.tech)

### 3.COLLECTION OF INFORMATION

A.Why Broker Solutions collects information including Personal Data.  
In order to better serve your particular needs, Broker Solutions (and third parties working on behalf of Broker Solutions ) may collect confidential information from and/or about you during the course of your relationship with Broker Solutions . Some of this information may be Personal Data.

This confidential information is collected through various methods including, but not limited to Broker Solutions 's platform(s), applications and websites. Broker Solutions may also obtain information directly from you and from third party sources. We may also use the standard "cookie" feature of major browser applications and other data capture mechanisms that allow us to store data about you including, without limitation, your visit to our platforms, applications and websites.

B.Specific information Broker Solutions collects and how it is collected

i.General

Broker Solutions collects several types of information when a data subject or automated system interacts with Broker Solutions , its platforms, applications, websites and service offerings. This information includes, for example:

- 1.Contact information including name, email, phone, fax and address of individual users of Broker Solutions 's platforms, applications and websites
- 2.Organization/Company name and customer type of individual users of Broker Solutions 's platforms, applications and websites
- 3.National ID (e.g. driving license, Passport, CONCAT, tax Id) of users of Broker Solutions 's platforms where required by applicable law, for example by MIFID II.
- 4.The browser types and versions used,
- 5.System information related to the accessing of Broker Solutions 's platforms, applications, websites and services including, without limitation, the website from which an accessing system reaches our website (so-called referrers), the sub-websites, the date and time of access to the Internet site, an Internet protocol address (IP address), the Internet service provider of the accessing system, and any other similar data
- 6.Personal data of employees and agents relevant to their employment or work on behalf of Broker Solutions including, name, email, phone, address, passport information, date of birth, photo, marital status, spouse and dependent information, NIC#, bank account details, emergency contact

information, salary information, ethnic information (self-identified) and past employment history

#### ii. Cookies

The Internet pages of Broker Solutions use cookies. Cookies are text files that are stored in a computer system via an Internet browser. Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID. Through the use of cookies, Broker Solutions can provide the users of this website with more user-friendly services that would not be possible without the cookie setting. By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow Broker Solutions to recognize our website users. The purpose of this recognition is to make it easier for users to utilize Broker Solutions's website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. The data subject may, at any time, prevent the setting of cookies through the Broker Solutions website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

#### iii. Information about data subjects from third parties

Broker Solutions obtains information including personal data from third parties. This occurs in two contexts:

1. Personal data about data subjects that are individuals that are employees or agents of Broker Solutions's institutional customers.
2. Service providers to Broker Solutions related to employment or retention of Broker Solutions's employees or agents.

In such cases, Broker Solutions is a Processor and not a Controller and Broker Solutions processes the information on behalf of or for the benefit of the Controller and relies on the Controller for

obtaining consent or other lawful purpose for processing the information.

#### 4. What Broker Solutions Does with the Information it collects

Broker Solutions uses confidential information including Personal Data in: (i) authenticating and verifying authorized use of our platforms, applications, websites, and services, and (ii) improving, offering and administering platforms, applications, websites, and services. We may also use and disclose confidential information and Personal Data in aggregate or statistical form which is not identifiable with the submitter, or as permitted/required by law.

Broker Solutions may also give information about the submitter, such as name and address, to persons or organizations that may wish to provide you with information about their or related products or services. These organizations may include affiliates of Broker Solutions .

#### 5. What is the lawful basis for Broker Solutions controlling or processing the information:

Broker Solutions will ensure that one of the following lawful bases exist for all confidential information collected, including, Personal Data:

A. Information is required to be collected by contract – where the processing is necessary for the performance of a contract. An example of this is when Broker Solutions collects individual representative information on customer contracts.

B. Compliance with legal/regulatory obligation: where the processing is necessary for Broker Solutions to comply with a legal obligation under applicable law. An example of this is where Broker Solutions collects identifying information, including National ID numbers, from traders using its platform under MIFID II.

C. Legitimate interest: Examples of legitimate interests include fraud prevention and transferring personal data within a group of companies or processing of personal data strictly necessary and proportionate for the purposes of ensuring network and information security.

D. Consent: where the individual has given consent for their personal data to be processed for a specific purpose. An example of this is where customers who are natural persons agree to use our website applications, or when an employee of Broker Solutions submits their personal information to our Human Resources department.

E. Vital interests of individual. An example of this is if Broker Solutions needed to process Personal Data because it is necessary to protect the individual's or someone else's life.

F. The processing is in the interest of the relevant public.

#### 6. What is the Period which Broker Solutions will keep the information

The criteria used to determine the period of storage of confidential information including personal data is the relevant lawful purpose for which it is held or 10 years, whichever is later. If the storage of the data is no longer required as previously stated then the confidential information including personal data is blocked or erased.

## 7. Rights of the data subject for information it collects

### A. Right of confirmation

Each data subject shall have the right to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact Broker Solutions 's Data Protection staff at the contact information stated herein.

### B. Right of access

Each data subject shall have the right to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the data subject may have access to the following information:

- i. the purposes of the processing;
- ii. the categories of personal data concerned;
- iii. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- iv. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- v. the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- vi. the existence of the right to lodge a complaint with a supervisory authority;
- vii. where the personal data are not collected from the data subject, any available information as to their source;
- viii. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.
- ix. Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case,

the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

#### C.Right to rectification

Each data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### D.Right to erasure (Right to be forgotten)

Each data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- i.The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- ii.The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- iii.The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- iv.The personal data have been unlawfully processed.
- v.The personal data must be erased for compliance with applicable law.
- vi.The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR. Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required.

#### E.Right of restriction of processing

Each data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- i. The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- ii. The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- iii. The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- iv. The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

#### F. Right to data portability

Each data subject shall have the right to receive the personal data concerning him or her, which was provided to Broker Solutions , in a structured, commonly used and machine-readable format. He or she shall have the right to transmit that data to another controller without hindrance from Broker Solutions , as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Broker Solutions .

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from Broker Solutions to another controller, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

#### G. Right to object

Each data subject shall have the right to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Broker Solutions shall no longer process the personal data in the event of the objection, unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims. If Broker Solutions processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data



subject objects to Broker Solutions to the processing for direct marketing purposes, Broker Solutions will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Broker Solutions for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

#### H. Automated individual decision-making, including profiling

Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by applicable law and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Broker Solutions shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

#### I. Right to withdraw data protection consent

Each data subject shall have the right to withdraw his or her consent to processing of his or her personal data at any time.

If a data subject wishes to exercise the rights stated herein, he or she may, at any time, contact Broker Solutions's privacy staff in writing at the contact information provided above.

### 8. Security — Data protection for applications and the application procedures

To help ensure the security of your confidential information that you submit to us via our platforms or Sites that use HTTPS, we use security software to encrypt the information before and during its transmission through the Internet. We allow information to be submitted for transmission only if your browser is compatible with our security software. If your browser is not compatible, you will receive a message indicating your transaction cannot be completed because of the security risk.

E-mail messages are not secure. Our security software does not encrypt e-mail messages. Please keep in mind that transmitting information via the Internet is never completely secure and that, therefore, any information submitted may be intercepted, viewed, collected, used, altered, copied or disclosed by others. We are not responsible for the security or confidentiality of communications you send to us (or that we send to you) through the Internet.

#### 9. Links to Other Web Sites

Broker Solutions 's applications and websites may contain links to other websites and applications of third parties. Please note that when you click on one of these links, you will be accessing a website or application that Broker Solutions does not control and which may be governed by privacy policies and practices that differ from Broker Solutions 's. Broker Solutions is not, and will not be, responsible for the privacy policies or practices of third parties or the content or security of any third-party websites and applications.