PRIVACY POLICY

Last Updated on October 2026

1. OUR COMMITMENT TO YOU

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.

This Privacy Policy provides an overview of how EPIDI EU LTD (the "Company") processes your personal data and sets out the information that the Company must provide to you for the purpose of the EU General Data Protection Regulation (the "GDPR") which is applicable as of 25 May 2018.

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.

As per the relevant sections of the Law 2016/679, if you are a natural person, the Company is the personal data processor and controller of your personal data in relation to the processing activities which your personal data undergo as stated further below.

For the purposes of this statement:

(a) Personal Data shall mean 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;

(b) Controller shall mean 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 Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

(c) Processor shall mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

2. COLLECTION OF INFORMATION

As part of the Company's client account opening procedures and ongoing obligations, needs to abide with the legislative framework currently in place with the Cyprus Securities and Exchange Commission (the "CySEC"). Specifically, the Company shall comply with its legal obligations under the AML Law (Law 13(I)/2018), as amended, and the AML Directive (Directive DI144-2007-08 of 2012) 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 (EU) 2017/565 (the "Delegated Regulation") and Law 87(I)/2017 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 Company based to the above-mentioned, is obliged to request, collect and maintain for at least five (5) years the following:

(a) Name and Surname
(b) Date of Birth
(c) Place of Birth
(d) Nationality
(e) Copy of the Passport and/or of the Identity Card
(f) Utility bill (including the full address of the client)
(g) Tax Identification Number
(h) Tax Residence
(i) Telephone number
(j) Email
(k) Profession
(l) Industry of Employment
(m) Gross Annual Income
(n) Net Worth
(o) Anticipated Turnover
(p) Bank Account Details

The Company may collect the said information directly from you (during the account opening procedure) and/or from other persons including for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers.

The Company may also collect Your Information in regard to your use of our website(s), such as pages visited, frequency, duration of visit and trading activities. The Company also keeps records of your trading behaviour, including a record of:

(a) Products you trade and their performance

(b) Historical data about the trades and investments you have made including the amount invested
(c) Historical data about your payment activities and your withdrawal activities.

Further to the above, the Company may also request further information to improve its Service to you (Existing or Potential Clients) or our activities (if you are our Provider for Trading Data) under our relevant Agreement, as the case may be, or comply with Applicable Regulations.

The Company records any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services that were provided by the Company to you and the relationship with you. The said recordings will be the Company's sole property and will constitute evidence of the communications between the Company and you.

3. USE OF THE INFORMATION

The Company will use, store, process 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 2001, as amended or replaced from time to time.

Your personal data (not publicly available information and/or already possessed by the Company without abiding with the provisions of the general data protection regulation), will be collected and processed explicitly and specifically only for the purposes that have been collected for ('purpose limitation') while the Company must require only the information necessary in relation to the purposes for which they have been collected.

We may transfer your personal information outside the European Economic Area. If we will make such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by Applicable Regulations. In furtherance, the Company follows the European Commission instructions in respect to this matter and it shall ensure that the third country that your data

may be transferred is recognised by the EU Commission, as adequate in respect to the protection of your personal data.

4. CONTACTING YOU

We may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or post.

If you agree, we or any of our Affiliates of the Company may make contact with you from time to time, by telephone, fax, email or post for marketing purposes to bring to your attention products or services that may be of interest to you or to conduct market research.

5. DISCLOSURE OF INFORMATION

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

(a) Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services.
(b) Partners or Tied Agents with whom the Company has closed relationships and who are exclusively working for the Company.
(c) Regulatory Authorities.
(d) Anyone authorised by you.
(e) Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
(f) Trade Repository or similar.
(g) 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 organisations 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.

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We may transfer your personal information outside the European Economic Area. If we will make such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by Applicable Regulations. In furtherance, the Company follows the European Commission instructions in respect to this matter and it shall ensure that the third country that your data may be transferred is recognised by the EU Commission, as adequate in respect to the protection of your personal data.

7. YOUR CONSENT

The use of your personal information requires your consent, such consent will be provided in accordance with the Client Agreement that it is provided to you during the account opening procedure and is also available on the Company's website(s). The Company shall

rely on the provided consent as its legal basis for processing your personal data. You have the right at any time to withdraw that consent by contacting us via phone or via email at data protection compliance@epidi.com.

Where you are a natural person and the use of your personal data requires your consent, the Company will request for your consent to be provided freely, specific, informed and an unambiguous indication of your desires, which by statement or by clear affirmative action, signifies agreement to the processing.

If at any case you feel compelled to consent or you will endure negative consequences if you do not, then your consent will not be valid. Additionally, your consent shall not be bundled-up as a non-negotiable part of terms and conditions, because such action would indicate that you haven't freely provided your consent.

In certain circumstances the company can process your data without your consent. The following are considered to be the most relevant:

(a) Processing is necessary for compliance with legal obligation to which the controller is subject.
(b) Processing is necessary for the performance of a contract to which the person is party, or in order to take measures of the person's request prior entering into a contract.
(c) Processing is necessary in order to protect the vital interests of the data subject.
(d) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of public authority or a third party to whom the data are communicated.
(e) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by the third party to whom the personal data are communicated, on condition that such interests override the rights, interests and fundamental freedoms of the persons.

8. MANAGEMENT OF YOUR PERSONAL INFORMATION AND SAFEGUARD MEASURES

The Company has taken all the appropriate organisational measures to ensure that your personal data are secured. Moreover, the Company has established an Internal Educational Training for its employees so as to mitigate any risks that may affect your data. The employees that are processing your data are being trained to respect the confidentiality of customer information and the privacy of individuals. We consider breaches of your privacy as top priority and the Company will enhance its internal procedures to prevent any such event.

The Company has implemented procedures in respect to safeguarding your data. Access to your information have only employees and/or Partners/Tied Agents that need to have access to the information in order to enable the continuity of the agreement between you and the Company.

Furthermore, we hold personal information in a combination of secure computer storage, secure servers and from time to time and if it is deemed necessary we will store them in paper-based files. The Company has taken all the necessary steps to protect the personal information that it holds from misuse, loss, unauthorised access, modification or disclosure.

While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

The Company shall keep your personal data for as long as the company has business relationship with you (physical person). Once the business relationship has been ended, we may keep your data for up to five (5) years in accordance with the Laws governing the Company.

The Company may keep your personal data for longer than five (5) years for legal, regulatory and/or any other obligatory reason. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

9. CHANGE OF INFORMATION

You may inform the Company at any time that Your Information has changed or that you wish the Company to delete information we hold about you by emailing us at compliance@epidi.com . We will change or delete Your Information in accordance with your instructions, except to the extent that we are required to hold Your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

10. RIGHT OF ACCESS

As a natural person you have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. Additionally, you may also request the reasoning of holding such information. To make a request, please contact us, verifying your identity and specifying what information you require. You may contact us via e-mail at compliance@epidi.com

11. QUESTIONS

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at compliance@epidi.com

Furthermore, in case you are not happy with the quality of Services we have provided you with in regard to the personal data processing, you as a natural person have the right to lodge a complaint with our supervisory authority which is the Commissioner for Personal Data Protection in the Republic of Cyprus.

12. UPDATE OF THIS POLICY

This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.