PRIVACY POLICY

Usage and Automatically Collected Information

When you access or use our Services, we automatically collect information about you (the type of information depends on the Site you are using), including:

Financial Information: We collect financial information related to your use of the Services, including information you provide to us or that we collect from public sources.
Log Information: We collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.
Device Information: We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
Activities on the Site: We collect records of activities on the Site, including, any content you post, your Kepler Group Account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.
Location Information: In accordance with your device permissions, we may collect information about the geo-location of your device.

Information Collected by Cookies and Other Tracking Technologies: We use different technologies to collect information, including cookies and web beacons. You can find out more about Kepler Group's use of cookies and similar technologies in our Cookie Policy.

Information We Collect from Other Sources

We may collect personal information about you from third-party entities when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies. We may also collect information about you from third parties, when you use or connect to Kepler Group by or through a third-party platform, such as Facebook or another site, you allow us to access and/or collect certain information from your third-party platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third-party platform for their use.

Unsolicited Information

If you provide us with personal information that we have not requested then we will endeavour to only retain the information that we are entitled or required to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

Use of Information

We use the information we collect to provide, maintain, and improve the Services, such as to administer, verify and maintain your account, to provide the Services you request and customize your experience with us. We also use the information we collect to:

1) carry out our obligations owed to you;
2) comply with our regulatory and other legal obligations;
3) monitor/access any content you post;
4) administer transactions including deposits and payments;
5) monitor trading activity on Kepler Group, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities;
6) determine whether a payment method is being abused;
7) compile statistical analysis of the pages of our platform and websites;
8) monitor and analyze our business;
9) investigate and manage enquiries, disputes and legal proceedings and comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;
10) provide information about you and your trading with us to credit reference/reporting agencies, which may include, but are not limited to: European Central Bank, EU and EEA Tax Authorities, FATF, and Bank institutions;
11) participate in crime prevention, legal and regulatory compliance and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement, even if not compelled to do so;

Sharing of Information

We will not share the personal information we hold about you except in the following circumstances:

1) between and among the Kepler Group Entity, Kepler Group and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and with professional advisors, vendors, consultants, and other service providers, such as payment service providers, IT hosting companies, banks, other financial institutions and credit reporting/reference agencies who need access to such information to carry out work on our behalf;
2) in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of Kepler Group by another company; 3) disclosure in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements; 4) if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of Kepler Group or others;

Social Sharing Features

If you have elected to use one of our applications provided via social networks (such as Facebook, Twitter, etc.), our application will not be granted access to your social network account general information which includes your name and username in the social network, profile picture, gender, networks, user ID, list of friends, and any other information you have permitted to be shared depending on the settings you establish with the entity that provides the social sharing feature. None of your personal social media information will be disclosed to our company.

Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements about our products and services on our behalf across the web and in mobile applications. This may involve cookies and other technologies to collect information about your use of the Services. This information may be used by Kepler Group to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services, and better understand your online activity in connection with the Services. Please refer to our Cookie Policy for more information about the cookies involved and the process of consenting or refusing cookies.

Your Choices and Rights

You may have certain rights and protections under the law regarding the processing of your personal data. For example, you may also have the right to object to, or request that we restrict, certain processing and in some circumstances to obtain a copy of the personal information in machine-readable format. There are limits to such rights where they apply and in certain

circumstances, we may not be required or able to meet your request, or we may only meet your request in part.

Legal Basis for Processing: For transparency purposes (where relevant under data protection legislation applicable to our processing of your personal information) we process your personal data on the following legal grounds:

Entering into and Performing the Contract with You: If you have an Kepler Group Account or have registered on the Site or for the Services, our legal basis for processing your personal information is that it is necessary for the performance of the relevant Kepler Group Entity's terms and conditions, terms of business and/or terms of use, and to provide the requested service to you. With respect to an Kepler Group Account, this includes facilitating access to our platform, processing payments and executing trades.

For other Justifiable Grounds, including Legal Obligation and Legitimate Interests: We process your personal information where necessary for Kepler Group to comply with legal and regulatory obligations we are under, and also where it is necessary for legitimate interests we have in conducting our business (or the legitimate interests of our partners in complying with their legal obligations), balanced against the rights of our customers, like you. These include without limitation:

1) Learning about your interests and preferences to contact you with information that is relevant to you and helping us target marketing communications and advertisements for our products and services so that they are more relevant to you.
2) Using your pseudonymised details to show you advertising for our products and services on social media platforms, such as Facebook or via other third-party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
3) Analyzing and continually improving the Site and the Services and helping us pilot test versions of the Site internally to develop new features and ensure the efficient running of Kepler Group's services.

Data Subject Requests: You may have the right to access personal data we hold about you and to ask that your personal data be updated, corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you can log into your account or contact us via this Link. Alternatively, you may also reach us by support email stated on the website. If you wish to delete or deactivate your account, please note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

Questions or Complaints: If you are interested in exercising any of these rights (or confirming if they apply to our processing of your personal data), you can log into your

account or contact us. This means that, in certain circumstances, we may not be required or able to meet your request, or we may only meet your request in part.

Promotional Communications

You will be receiving promotional emails or text messages from Kepler Group by following the instructions in those emails or text messages. We may send you non-promotional emails, such as service messages about your Kepler Group Account or our ongoing business relationship.

Transfer of Information to Other Countries

When using the Services, your data is processed and stored in the EU and other countries, including the United Kingdom and Switzerland. We and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide levels of data protection equivalent to your home jurisdiction.

Where we transfer personal data from the EEA or from the UK to countries outside of the EEA or UK which are not recognized as providing adequate data protection, we provide appropriate safeguards in the form of intercompany agreements based on the Standard Contractual Clauses authorized under EU law or UK law (as applicable).

Sharing of Your Personal Data

To provide the Kepler Group Money products and services, Kepler Group will share your personal data with third parties including: agency banks which provide banking services, including issuing a sort code for UK clients, card networks, such as VISA, issuer processor, card processors and related service providers which support secure online payments and card manufacturers which produce and dispatch the physical card to you.

Retention of Personal Information

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. For example, if you are invited to use Kepler Group by another user, we will store the personal information about you provided by such other users for a period of six months in order to send an invitation to you by email.

If you have an Kepler Group Account, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us.

Security and Integrity of Information

We protect your personal information by using data security technology and using tools such as firewalls and data encryption. We also require that you use a personal username and password every time you access your account online. As set out in the relevant Kepler Group Entity's terms and conditions, terms of business and/or terms of use, you must not share your password with anyone else. We recommend that you do not re-use a password previously used by you for other platforms/services.

We restrict access to personal information at our offices so that only officers and/or employees with a legitimate business purpose can access it.

Minors

Kepler Group is not available for users under the age of 18 (or the age of legal consent for the jurisdiction the user is located in) (a "Minor"). If you are a Minor, you should not use any of our services nor provide any personal information to us.

If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a Minor has shared any information with us, please contact us via the support email stated on the website.

Changes to this Privacy Policy

The Policy will be reviewed and updated from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate in light of any changes in law, technology and the business environment. Any personal information held will be governed by our most current Policy. Please refer back to the Policy on a regular basis.

Links

The Site may include links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such websites. Our terms of use and our Privacy Policy apply only to information collected by us in accordance with this Policy.