

Privacy Notice - Partnership Program

Effective as of 01.04.2025

This Privacy Notice explains how your personal data is collected, and otherwise processed, when you apply for or participate in the Partnership Program operated by entities forming part of the consolidated group of companies controlled by Admirals Group AS (collectively “we”, “us”, or “our”).

This Notice applies specifically to individuals and entities who engage with us as affiliates, marketing partners, or introducing brokers under our Partnership Program.

Any personal data we collect is used only for the purposes we have collected it for and as allowed under the applicable acts of legislation.

This Privacy Notice is reviewed regularly and may be amended at any time, to ensure that it remains up-to-date with applicable laws, as well as changes to our business operations and practices. Any personal data we hold will be governed by our most recent Privacy Notice. You will be notified about material changes via our website or emails, however you are encouraged to review this Privacy Notice periodically, so as to be always informed about how we are processing and protecting your personal data.

1. Data controller

The controller of your personal data is the respective entity with which you have entered into a partnership agreement. A full list of the Admirals Group AS entities operating the Partnership Program is available in paragraph 9 of this Privacy Notice.

2. Categories of personal data we collect

When you register or participate in the Partnership Program, we may collect and process the following personal data:

2.1. Identification and contact information: full name, date of birth, email, phone number, address, country of residence.

2.2. Personal data from documentation: identity verification documents, such as passport, ID card, or driving licence; data from documents serving as proof of address, such as bank statements, utility bills, proof of cryptocurrency wallet ownership, dividend vouchers, and government-issued documents; data from documents serving as proof of income, such as salary payslips, loan agreements, property sale agreements, rental income statements, dividend statements, and inheritance documents; data from corporate documents (applicable to legal entities), such as certificate of incorporation, memorandum and articles of association, commercial registry extract of latest shareholders list; other documents, such as CV.

2.3. Financial/payment details: bank account or other payment information, to process payments to



you, based on your compensation model.

2.4. Personal data to monitor your use of our website: please see our Cookies Policy on our website.

2.5. Technical Data: such as internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and other technology on the devices you use to access our website and mobile app and electronic services.

2.6. Partner category & activity: your selected compensation model, referral performance, and lead/client activity data.

2.7. Communication data: Any correspondence between you and us, including emails or messages via different communication platforms.

3. Purposes and legal basis of processing

We process your personal data lawfully, fairly, and in a transparent manner for the following purposes:

3.1. To enter into or perform our agreement (legal basis: performance of a contract).

3.2. To manage our relationship with you (legal basis: performance of a contract; legitimate interests).

3.3. To track referrals, traffic and client activity (legal basis: legitimate interests).

3.4. To process payments to you, based on your compensation model (legal basis: performance of a contract).

3.5. To comply with legal and regulatory requirements (legal basis: compliance with legal obligations).

3.6. To prevent fraud or misuse of our Partnership Program (legal basis: legitimate interests).

3.7. To investigate or settle enquiries or disputes (legal basis: legitimate interests).

3.8. For record keeping purposes (legal basis: compliance with legal obligations, legitimate interests).

Where our use of your personal data does not fall under one of the above legal bases, we will require your consent. Such consent shall be freely given by you and you have the right to withdraw it at any time by contacting us using the contact details set out in this Privacy Notice.

4. Data sharing and transfers

Your data may be shared with other recipients, such as:

- 4.1. Other entities within Admirals Group AS, for operational and administrative purposes.
- 4.2. Payment service providers, to issue commission payments.
- 4.3. Marketing or analytics platforms, as part of our referral tracking tools.
- 4.4. Web and data hosting providers, sales and digital platform providers, communication tool providers.
- 4.5. Legal or regulatory authorities, as required by applicable laws.
- 4.6. Auditors, legal and financial consultants, or any other processors authorized by us.

We may share your data in the event of a merge, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

We and our service providers may transfer your information to, or store it in or grant access to it from, jurisdictions that may not provide levels of data protection equivalent to your home jurisdiction. Where we transfer personal data from the EU/EEA to countries outside of the EU/EEA which are not recognized as providing adequate data protection, we provide appropriate safeguards, for example Standard Contractual Clauses issued by the European Commission under the EU law.

5. Data retention

We retain your personal data only as long as necessary to fulfil the purposes for which it was collected, including compliance with legal and financial obligations. In general, personal data related to payments and contracts is retained for at least five (5) years after the termination of the relationship, or longer, as required by law. We may keep your data for longer than seven (7) years if for legal, regulatory or technical reasons we cannot delete it. We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical/ internal analysis purposes and fraud prevention.

6. Your rights

Under certain circumstances you are entitled to specific rights and protections under applicable data protection laws, in relation to your personal data. We will use our best endeavours to respond to requests concerning personal data processing and, when applicable, to allow you to exercise your rights under the applicable laws.

- 6.1. You have the right to request access to, or copies of, your personal data, in machine readable format. You also have the right to request information regarding the processing of those personal data.

6.2. If the personal information we hold about you is inaccurate or incomplete, you have the right to have it updated or corrected.

6.3. You have the right to object to, or request that we restrict, certain processing, for example for marketing purposes.

6.4. You may have the right to request, on legitimate grounds, erasure of your personal data. The request to delete your personal data will result in the closure of your account. However, we are obliged to maintain your personal data for a certain period of time, to comply with our legal and regulatory requirements, as well as in accordance with internal compliance requirements in relation to record keeping.

6.5. You have the right to obtain personal information held by us, provided that we have this in a structured, commonly used and machine-readable format, and to reuse it elsewhere or ask us to transfer this to a third party of your choice. In case of the forwarding of data to a third party, a clear written consent from you must be received.

6.6. You have the right to lodge a complaint regarding the processing of your personal data by us. You can lodge your complaint by email at: dpo@admiralmarkets.com. It is noted that, in certain circumstances, we may not be required or able to meet your request(s), or we may meet your request(s) in part. If you feel that your concerns have not been adequately addressed by us, you may have the right to lodge a complaint with the relevant data protection supervisory authority where you reside.

7. Security of your data

Your data is safeguarded with the appropriate technical and organisational measures to prevent unauthorised access, unlawful processing or disclosure, accidental loss, modification or destruction. Among other things, such security measures include the following:

7.1. Use of encryption protocols to safeguard data in transit and at rest, secure firewalls and intrusion detection systems to prevent unauthorized access.

7.2. Internal rules to ensure that your personal data is processed in line with applicable requirements. Regular checks are conducted to ensure compliance with these rules.

7.3. Access to your personal data is limited to a need-to-know basis and strictly in accordance with the job duties of each employee or contractor.

7.4. Unauthorised processing of data, including recording, alteration, deletion, reading, copying, unauthorised transport of records and any other unauthorised use of data (not prescribed by official duties) is strictly prohibited.

7.5. Personal authentication for every user of the database.

7.6. All data processing operations are traceable, enabling the identification of the individual performing the operation, the nature and time of the activity, the data affected, and any transmission thereof, while also ensuring the possibility to restore the original content in the event of any modification.

8. Automated decision making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

9. List of Admirals Group AS entities operating the Partnership Program

The following is a list of the Admirals Group AS entities which may process your personal data in connection with the Partnership Program:

9.1. Admirals SC Ltd, address: Suite 3, Global Village, Jivan's Complex, Mont Fleuri, Mahé, Seychelles

9.2. Admiral Markets AS/ Jordan LLC, address: 1st floor, Time Centre Building, Eritrea Street, Um Uthaina, Amman, Jordan

9.3. Admirals Europe Ltd., address: Agias Zonis 63, 3090, Limassol, Cyprus

9.4. Admiral Markets AS, address: Maakri 19/1, 10145 Tallinn, Estonia

For more details, or if you have any specific questions regarding the entity that is handling your personal data, please contact us via the information provided in the "Contact Us" section of this Privacy Notice.

10. Contact us

If you have any questions or concerns relating to the processing of personal data by us, or if you wish to exercise any rights under section 6 of this Privacy Notice, please contact our appointed Data Protection Officer by email: dpo@admiralmarkets.com, or post: Agias Zonis 63, 3090 Limassol, Cyprus, clearly marking "FAO: Data Protection Officer". Please note that we may ask you provide additional information to verify your identity before allowing you to exercise certain rights.