



DXA Capital Investment Services SA

Privacy Policy

Our Commitment to You

Thank you for showing interest in our service. In order for us to provide you with our service we are required to collect and process certain personal data about you and your activity.

By entrusting us with your personal data, we would like to assure you of our commitment to keep such information private and to operate in accordance with all regulatory laws and all EU data protection laws, including the General Data Protection Regulation (GDPR) 679/2016 (EU).

We have taken measurable steps to protect the confidentiality, security and integrity of this data. We encourage you to review the following information carefully.

Legal Grounds for data collection

Processing of your personal information (meaning, any data which may potentially allow your identification with reasonable means; hereinafter "**Personal Information**") is necessary for the performance of our contractual obligations towards you and for providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure, and other uses of your Personal Information as described in this Privacy Policy. Alternatively, where our use of your personal information does not fall under one of the above-mentioned categories, we will require you to provide your consent.

How do we receive information about you?

We receive your Personal Information from various sources:

1. When you provide us with your personal details in order to create a Finnso account (for example, your full name and email address);
2. When you upload documents to verify your identity and confirm your provided information (for example, to confirm your residence you provide us with your utility bill)
3. When you use or access our site and services, in connection with your use of our services (for example, your financial transactions);
4. From third-party providers and services, such as credit reference agencies, fraud prevention

agencies, identity verification vendors, banks, authentication service providers and public registers.

What type of information we collect?

To open a Finnso account, and in order to provide you with our services we will need you to collect the following information:

☐ Personal Information

We collect the following Personal Information about you:

- Registration information – your full name, email address, phone number, occupation, country of residency and address, your age (to verify you are over 18 years of age and eligible to participate in our service) and date of birth, as well as documentation depicting personal information such as a copy of your national identity card or passport, a copy of a recent utility bill/bank statement as evidence of your residential address. When creating an account with the Company, we will also require you to provide information related to your profession and professional background, employment details, knowledge and experience in trading and data on your risk appetite and tolerance. The Company may also require the provision of data that is necessary to provide our services in line with the applicable legal requirements.
- Voluntary information – when you communicate with us (for example when you send us an email or use a “contact us” form on our site) we collect the personal information you provided us with such as your e-mail address, first and last name.
- Financial information – by its nature, your use of our services includes financial transactions, thus requiring us to obtain your financial details, which include, but are not limited to your payment details (such as credit card, bank account details Tax residence, and Tax Identification Number and financial transactions performed through our services).
- Technical information – we collect certain technical information that is automatically recorded when you use our services, such as your IP address, MAC address, device approximate location.
- Transactional Behavior Information.
- Recordings of conversations and communications (such as telephone or electronic) upon your prior notification and in accordance with the requirements of the legislative framework.

☐ Non-Personal Information

We record and collect data from or about your device (for example your computer or your mobile device) when you access our services and visit our site. This includes, but not limited to your login credentials, UDID, Google advertising ID, IDFA, cookie identifiers, and may include other identifiers such as your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and

personalize your experience with us.

If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

Tracking Technologies

When you visit or access our services we use (and authorize 3rd parties to use) pixels, cookies, events, and other technologies ("**Tracking Technologies**"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our services, improve our site's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information

To learn more about cookies please visit our [Cookie Policy](#) page.

This data is collected by us, depending on the investment service provided or the corresponding product to which it relates and is kept by our Company in written form and/or by electronic or magnetic means. Data relating to your identity, contact details, family and financial status, investment objectives and tolerance for investment risks, as well as information about your knowledge and experience in the investment field, is collected directly from you. The data of your transactional behavior can result indirectly from the operation of our contractual relationship and the products and services of our Company you use. Also, the data for carrying out payment transactions is collected by the relevant payment service providers. Chat and communication log data is collected from the relevant log files. Finally, data that may associate you with high-risk persons in terms of money laundering and/or terrorist financing legislation (e.g. politically exposed persons, persons on sanctions lists, etc.), may be collected from the internet, i.e. from electronic databases maintained by third party providers or through intelligent search software.

How do we use the information we collect?

- Provision of service - we will use your Personal Information you provide us for the provision and improvement of our services to you.
 - your identification (via relevant documentation) and our communications during the onboarding (pre-contractual contact) as well as during the operation of the contractual relationship between us;
 - the preparation and smooth operation of the contract for the provision of investment services and the monitoring of the proper fulfillment of the obligations undertaken on both sides.

- The documentation and subsequent processing of requests that you may submit to us.
- Marketing purposes - we will use your Personal Information (such as your email address or phone number). For example, by subscribing to our newsletter you will receive announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Information, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the “unsubscribe” link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications or reply to your queries and feedback you provide us.

Opt-out of receiving marketing materials - If you do not want us to use or share your personal information for marketing purposes, you may opt-out in accordance with the below "Opt-out" process. Please note that even if you opt-out, we may still use and share your personal information with third parties for non-marketing purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your personal information are authorized to use your Personal Information only as necessary to provide these nonmarketing services. Consequently, **you have the right to opt-out at any time by contacting:**

- The Company's Data Protection Officer at the following e-mail address: compliance@finnso.com, or
- The Company's Customer Support Team if any assistance is needed at +30 213 0888 496 or by email at support@finnso.com
- Analytics, surveys and research - we are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyze the information we have to develop, evaluate and improve these features.
- Protecting our interests - we use your Personal Information when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of DXA Capital S.A., its users and/or partners.
- Compliance with legal and regulatory requirements - we also use your Personal Information to investigate violations and prevent money laundering and perform due-diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

With whom do we share your personal information?

- Internal concerned parties - we share your information with companies in our group, as well as our employees limited to those employees or partners who need to know the information to provide you with our services.
- Financial providers and payment processors - we share your financial information about you for the purposes of accepting deposits or performing risk analysis.
- Business partners - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- Legal and regulatory entities - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our or take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of DXA Capital S.A., its users and/or partners. We may also disclose your personal information where requested by our supervisor (the Hellenic Capital Market Commission,), or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker.
- Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

Transfer of data outside the EEA

Please note that some data recipients may be located outside the European Economic Area (“EEA”). In such cases, we will transfer your data only to such countries as specified by the European Commission as providing an adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

We will take all steps reasonably necessary to ensure that where we carry out such transfers this will be made subject to applicable, Regulation EU 2016/679 and national laws where required subject to the appropriate safeguards.

How we protect your information

We have implemented appropriate organizational, technical, and physical measures such as data encryption, access management procedure, clean desk policy, business continuity, and disaster recovery plan, to ensure a level of enhanced security and prevent any unauthorized access, use, loss, alteration, or disclosure of your personal information.

Your information is stored on secure servers and isn’t publicly available. We limit access to your

information only to those employees or partners who need to know the information in order to enable the carrying out of the agreement between us.

It is your responsibility to make sure that your password is only known to you and not to disclose it to anyone else. Protecting your password appropriately and limiting access to your account may prevent any unauthorized access (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

Although, there is risk involved in transmitting information over the internet the Company endeavors to protect your personal data by taking serious precautions.

Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined considering 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.

Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications, and anything else as required by applicable laws and regulations.

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.

User Rights

You may request to:

- a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
- b. Receive a copy of personal information we hold about you in a structured, commonly used, and machine-readable format.
- c. Request rectification of your personal information that is in our control.
- d. Request erasure of your personal information.
- e. Object to the processing of personal information by us.
- f. Request to restrict processing of your personal information by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

HOW TO CONTACT US?

If you wish to exercise any of the aforementioned rights, or receive more information, please contact our Data Protection Officer (“DPO”) using the details provided below:

Email: compliance@Finnso.com

If you decide to terminate your account, you may do so by emailing us at. If you terminate your account, please be aware that personal information that you have provided us may still be maintained for legal and regulatory reasons (as described above), but it will no longer be accessible via your account.

Updates to this Policy

This Privacy Policy is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.