

PRIVACY POLICY FLEX.OPTIONS

1. INTRODUCTION

- 1.1 Flex.Options takes your privacy very seriously and is committed to protect your personal data and respect your privacy. We comply with all relevant data protection laws, including the EU General Data Protection Regulation 2016/679 (GDPR).
- 1.2 In this policy we explain to you how we collect and process your personal data and for which purposes. We ask you to read it carefully to understand our views and practices regarding your personal data.
- 1.3 Any terms used throughout this policy that are defined in our Terms of Use, have the same meaning in this policy.

2. DATA CONTROLLER

- 2.1 Our Website and Platform are operated by Flex Options Limited. We act as your data controller. This means that we are responsible for, and control the collecting and processing of, your personal data. You can find all our details under How to contact us.
- 2.2 This privacy policy relates to your use of our Website and Platform. Throughout our Website we may link to other websites owned and operated by certain third parties, for example to make additional services available to you. These third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these third party websites, please consult their privacy policies as appropriate.

3. PERSONAL DATA WE COLLECT

- 3.1 We collect personal information about you when you access our Website and Platform, create a user account, contact us and use our Services. Personal information is sometimes collected directly, such as when you create an account or use our Services and sometimes indirectly, such as when you browse our Website (please refer to Cookies below).
- 3.2 It depends on the particular activities you carry out through our Website and Platform, which personal information is collected. Please see below for an overview of activities and personal data involved in those activities.
 - 3.2.1 When you create a user account with us, we collect your **name, country of residence and e-mail address**. We also ask you to set a **password**. We ask for this information to create and manage your account with us and to communicate with

you about your account. We rely on the performance of our contract with you as well as our legal obligations as the lawful bases for collecting and processing such personal information. This information is kept by us until you close your account or we close your account, unless we need to retain such information for longer to comply with legal obligations.

- 3.2.2 When you contact us, you may provide us with other personal information. Such information is required to be able to help you with your query and to communicate with you about it. The lawful basis we rely on to collect and process this information is our legitimate interest to answer your questions and solve your queries. We will keep this information until your question is answered or query is resolved.
- 3.2.3 When you access our Website and Platform, we collect information about your visit, device and browsing activities. This information may include personal information, such as your **IP address**, and is required to log you in to your account, to help us analyze traffic, and to operate our referral program. We rely on the performance of our contract with you and our legitimate interest to improve our Website, Platform and Services for our users. Please refer to Cookies for more information.
- 3.2.4 When you use our Services, we require additional personal information from you. We perform two checks. One to verify your identity, which requires you to upload your photo identification document (your passport or driver's licence or state ID) and one to verify your residential address, which requires to you upload proof of address, such as a utility bill. This information is required by us to comply with legislation with regards to anti-money laundering and know your customer. The lawful basis we rely on for the collecting and processing of this information is our legal obligation to comply with such legislation.

4. MARKETING

We will occasionally send you emails about updates and new features available on our Platform. Our system is set to include all account holders in these communications automatically. However, we respect your preferences and understand if you choose not to receive such updates. You are given the option to unsubscribe from these communications at any time. You can do this by updating your preferences in your account settings or by clicking the 'unsubscribe' link found at the bottom of our emails.

5. COOKIES

- 5.1 A cookie is a small text file that is placed onto the electronic device you use when you visit our Website. Cookies can be used to help you navigate websites more efficiently and to

perform certain functions, as well as to provide information to us. There are several types of cookies and other online tracking devices such as web beacons, action tags, local shared objects or flash cookies, and single-pixel gifs. Cookies can perform different functions and serve different purposes:

- 5.1.1 Strictly necessary cookies: these cookies are required for a good operation of our site and include, for example, cookies enabling you to log into secure areas of our site. Because these cookies are necessary for the operation of our platform, you cannot turn them off.
- 5.1.2 Analytical/performance cookies: these cookies allow us to recognize and keep count of the visitors of our Platform and see how our visitors navigate our Website. They enable us to estimate our audience size and usage patterns and help us to improve our Platform so your online experience can be made more efficient and enjoyable.
- 5.1.3 Functionality cookies: these cookies are used to recognize visitors returning to our Platform. They enable us to personalize our content for you and remember your preferences. This speeds up your access to our Platform.
- 5.1.4 Targeting cookies: these cookies record your visits to our Website, the pages you visited and the links you have followed. We use such information to make our Platform - and advertising displayed on it - more relevant to your interests.
- 5.1.5 Referral cookies: these cookies enable us to record a visit to our Website via the personal referral link of a participant to our referral program.
- 5.2 Please note that you can always withdraw your consent to the use of cookies by adjusting the privacy preferences of your browser. Please be aware that restricting or deleting cookies may impact on the functionality of our Website and your ability to use our Website.
- 5.3 We also use Google Analytics for anonymous reporting of site usage and for advertising on the Website. You can opt-out of Google Analytics monitoring your behaviour on our Website via Google's opt-out tool. We may also use other third-party analytics providers to monitor your behavior on our Website. Should you want to know which providers we use at any given time, please send us an e-mail with a request for that information and we will provide you with the details of our then current providers including details of how to opt-out.

6. SHARING YOUR PERSONAL INFORMATION

- 6.1 We would like to stress that we do not sell your personal information to any other party.
- 6.2 However, we may share some of your personal information (your contact details) with selected third party marketing automation providers for marketing purposes. We may also share your personal information with third parties for the purpose of conducting verification processes on our behalf.

- 6.3 Other than that, we only share your personal information if we are under a duty to disclose or share your personal data in order to comply with any laws, legal obligations or investigations.
- 6.4 In the event we receive a legal request to disclose personal information, we may notify you of such request before we do so, unless this is expressly prohibited by the authority making the request or if notifying you would be detrimental to us, the party requesting your personal information, or any other person affected, or to the investigation itself. If we can't notify you of such requests beforehand for the reasons set out above, we will try to notify you afterwards.

7. HOW AND FOR HOW LONG WE KEEP YOUR PERSONAL DATA

- 7.1 We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or otherwise accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 7.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website or Platform, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 7.3 Unfortunately, we cannot guarantee that the transmission of information via the internet is completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website and Platform; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 7.4 We only retain your personal data for as long as your account on our Website is active or for as long as we need it to fulfill the purposes for which we have initially collected it. If your data is not required anymore for contractual or statutory obligations, we normally delete your data. However, we do retain certain data for longer to comply with the retention obligations of applicable laws, for example laws and regulations on taxes and the prevention of fraud and anti-money laundering.

8. TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EEA

Our services are directed to users located all over the world. The following applies to users located in the European Economic Area (EEA): the personal data that we receive and collect from you may be transferred to, and stored at, a destination outside the EEA. Such countries may not have the same data protection laws as are applicable in the EEA. In the event your personal information is transferred to such countries, we have ensured that appropriate safeguards are put in place to protect your privacy rights and give you remedies

in the unlikely event of a misuse of your personal information.

9. YOUR RIGHTS

- 9.1 Under data protection laws, you have the right (1) to ask us about the information we hold about you, how we use that information and for a copy of that information, (2) to rectify any inaccurate personal information or complete any incomplete information, (3) of erasure, subject to our compliance with legal obligations, (4) of restriction of processing in certain situations, (5) to withdraw your consent where consent is being relied on as a lawful basis for processing, (6) to object to processing of personal information in certain situations and for direct marketing purposes, (7) to data portability.
- 9.2 All the rights referred to in 9.1 can be enjoyed free of charge. You can exercise your rights by contacting us and let us know the information your request relates to. We may request you for proof of identity and address when you exercise your rights.
- 9.3 Please note that we may not always be able to comply fully with your request for erasure of your data because we are under legal obligations to retain certain data concerning you for a longer time.

10. CHANGES TO OUR PRIVACY POLICY

- 10.1 We may change this privacy policy from time to time. When we do, we will communicate such changes to you.
- 10.2 If the changes made are fundamental, we will e-mail all our registered users our revised privacy policy at least 30 days before such changes become effective. Your continued use of our Website and Platform after the date on which the changes become effective, is deemed your acceptance of those changes.

11. MAKE A COMPLAINT

If you encounter any problems in relation to the use of your personal information, please contact us so we can try to resolve your query or concern. You also have the right to lodge a complaint with the supervisory authority in the EU member state where you work, normally live or where any alleged data infringement of data protection has occurred.

12. HOW TO CONTACT US

- 12.1 Questions, comments and requests regarding this Privacy Policy should be addressed to

the data controller, Flex Options Ltd, via e-mail to support@flex.options.