PRIVACY POLICY

Qube Markets Global Fintech Limited

16th September 2026

1. INTRODUCTION

Qube Markets Global Fintech Limited ("we", "our", or "us") respects your privacy and is committed to handling your personal information in accordance with the privacy laws that apply to us. This Policy outlines your privacy rights and describes how we, as data "controller", manage and protect your personal information. It also explains how you can contact us if you have any questions or complaints about our privacy practices.

By visiting our website, applying for or using any of our products or services, or providing us with your personal information, your personal information may be collected, held, used, disclosed or otherwise processed as set out in this Policy.

We keep this Policy under regular review and may make changes to it from time to time to reflect changes in the law and/or our privacy practices. We'll publish the latest version of this Policy on our website.

2. WHAT PERSONAL INFORMATION WE COLLECT AND HOLD

The type of personal information that we collect and hold about you may include some or all of the following:

- Personal and contact details such as your name, date of birth, gender, address, phone number and email address;
- Account and transaction information such as your trading account details, the transactions you make on your account and your nominated bank account details;
- Government identity documents and identifiers such as your driver's license, passport and national identity card;
- Financial information such as your investment experience and objectives, business interests and assets, income, and tolerance to risk;
- Investigation information such as financial crime and fraud checks;
- Records of correspondence such as phone conversations, meetings, emails and other digital communications in relation to your dealings with us;
- Online activity based on how you use our website and trading platform, such as your IP address, personalised settings, and geographical information.

In some cases, we may also collect sensitive or special categories information about you. This may include biometric information used for fraud prevention and identification purposes.

Where we collect or process sensitive personal information, biometric information, information relating to offences or convictions, or other categories of information subject to additional legal requirements, we'll do so only where permitted by law and, where required, subject to your express consent and/or any applicable declaration, authorisation or approval from the National Commission for Information Technology and Civil Liberties (CNIL) ("**Commission**").

You don't have to provide us with your personal information. However, if the information is needed to meet our legal or regulatory obligations or enter into an agreement with you, and you choose not to provide the information; we may not be able to provide (or continue to provide) our products or services to you.

3. HOW WE COLLECT YOUR INFORMATION

We collect most of your personal information directly from you when you:

- Create an account;
- Enquire about, apply for, or use our products or services;
- Enter our promotion or survey;
- Visit our website or our trading platform;
- Otherwise interact with our Account Managers, Customer Support, or other teams.

We may also collect information about you from other sources from time to time, including:

- Our related companies;
- People who act for you such as your signatory, accountant, lawyer or joint account holder;
- Brokers who have introduced you to us;
- Our institutional customers, if you engage with us in the capacity of an officer, director, trustee, partner, shareholder and/or agent of our institutional customers;
- Use of data analytics, by combining and analysing information that we and our related companies already hold about you to create insights and trend analysis;
- Our information and identity service providers which support our detection and prevention of crime and fraud;
- Government and law enforcement agencies;
- Publicly available information on the Internet and government agency registers.

Where we obtain personal information about you from a third party rather than directly from you, we'll provide you with the information required under applicable data protection law at the time the information is recorded or, where applicable, no later than the first disclosure of that information, unless an applicable exception applies, including where you have already been informed or where providing such information is impossible or would involve disproportionate effort.

4. HOW WE USE YOUR INFORMATION

We may use your personal information for the following purposes:

- Provide you with the products and services that you've asked for;
- Establish and manage your trading account, including the execution of your trading orders, payments and instructions;
- Assess whether you qualify as a wholesale customer or other designated type of customer;
- Confirm your identity and carry out due diligence checks;
- Manage and respond to your queries and any complaints about us;
- Evaluate and improve our products and services through analysing how you use them;
- Detect, prevent and investigate fraud, misconduct and other criminal activity;
- Inform you about our products and services by email, phone and SMS, where permitted by law or if you've provided consent ;

- Comply with our legal and regulatory obligations.

We'll only use your personal information where we have a valid legal reason to do so. Depending on the specific purpose for which we are using your information, we may rely on one or more of the following legal reasons:

- We have your consent;
- Necessary for us to perform a contract with you or to take specific steps before entering into such contract;
- Necessary for us to comply with applicable legal and regulatory obligations;
- Necessary for our legitimate interests or those of a third party, provided that such interests are not overridden by your rights and interests.

5. WHO WE SHARE YOUR INFORMATION WITH

We may share your personal information, when permitted or required by law or with your consent, with:

- Our related companies and external advisors such as our accountants, lawyers, consultants and auditors;
- Business partners and other organisations who facilitate your trading and payments, such as banks, liquidity providers, payment service providers, and trading platform, identity verification, software, system and cloud hosting services;
- Brokers who introduce you to us;
- Anyone authorised by you including any joint account holders;
- Regulatory authorities, government bodies, external dispute resolution schemes, and any court and law enforcement agencies.

When we share personal information, we do so in accordance with applicable data privacy laws and our internal security standards. We take reasonable steps to ensure all third parties receiving your personal information from us protect your personal information in a manner similar to the way we do this. Where a third party processes personal information on our behalf, we require the provider, as appropriate, to process the information in accordance with our instructions and to maintain appropriate confidentiality, technical and organisational security measures. We may impose such requirements through contractual arrangements and other appropriate safeguards.

6. USE OF THIRD-PARTY TECHNOLOGY PROVIDERS

We may engage third-party service providers, software vendors, and technology infrastructure providers to support the operation of our business and the provision of our products and services. Such providers may include, without limitation, customer relationship management (CRM) systems, cloud hosting providers, Software-as-a-Service (SaaS) platforms, communication systems, data storage providers, onboarding and identity verification providers, analytics providers, cybersecurity providers, payment service providers, and other technology or operational support providers.

Accordingly, your personal information may be collected, processed, transmitted, disclosed, or stored through systems operated by third-party providers, including providers located outside your jurisdiction.

We take reasonable steps to protect personal information and seek to engage service providers that we reasonably believe maintain appropriate technical and organisational security measures. Where such providers process personal information on our behalf, we take reasonable steps to ensure that they provide appropriate safeguards in relation to the security and confidentiality of the information and that their processing is governed by appropriate contractual arrangements, including requirements to process information only in accordance with authorised instructions where required by applicable law.

However, no electronic transmission, software platform, cloud environment, internet-based system, or data storage solution can be guaranteed to be completely secure, uninterrupted, or free from cyber risks, unauthorised access, operational failures, or security vulnerabilities.

By using our services, you acknowledge and accept the risks inherent in electronic communications and technology-based services, including risks associated with third-party software and infrastructure providers.

To the maximum extent permitted by law, we'll not be responsible for losses arising solely from events outside our reasonable control where we have complied with our applicable legal obligations and have taken reasonable and appropriate measures to protect personal information.

7. HOW WE STORE AND TRANSFER YOUR PERSONAL INFORMATION INTERNATIONALLY

Sometimes we need to transfer your personal information outside your country of residence to our related companies, service providers, advisors, as well as other recipients required or authorised by law. By providing your personal information to us or using our products and services, you consent to us transferring and storing your information overseas for the purposes set out in this Privacy Policy.

When we transfer your information to other countries that are not recognised under applicable law as offering an adequate level of data protection, we'll take appropriate steps to ensure your information remains protected. These include putting in place agreements that incorporate appropriate data protection clauses and conducting transfer risk assessments, where required by applicable law. We'll also comply with any declaration, prior authorisation, approval by the Commission or other regulatory requirement applicable to the transfer

8. HOW WE PROTECT YOUR INFORMATION

We recognise the importance of keeping your personal information safe. We have a range of technical and organisational measures in place to protect your information from misuse, loss, unauthorised access, modification or disclosure, having regard to the nature of the personal information concerned and the risks associated with the relevant processing, such as:

- Implementing information security policies and providing regular training to our staff on privacy and information security;
- Limiting access to our premises and systems through permission restrictions and passwords;
- Employing electronic security such as firewalls, data encryption and anti-virus software;
- Ensuring our service providers and agents, including those located overseas, to maintain appropriate security standards, through contractual provisions and third-party oversight.

9. HOW LONG WE KEEP YOUR INFORMATION

We keep your personal information while you're a customer and for a period of time after that. The period we keep information for will depend on the type of information, contractual obligations, our legitimate business needs, as well as any applicable law or regulation that require or permit us to keep information for certain minimum periods.

In determining the appropriate retention period, we may consider, among other things:

- The purpose for which the information was collected;
- Applicable legal, regulatory and record-keeping obligations;
- Anti-money laundering and counter-terrorist financing requirements;
- The duration of our contractual relationship with you;
- The need to establish, exercise or defend legal claims;
- Regulatory investigations or enquiries; and
- Applicable limitation periods.

When we consider information is no longer needed, we'll take reasonable steps to securely destroy or de-identify it.

10. WHAT RIGHTS DO YOU HAVE OVER YOUR INFORMATION

We aim to ensure the information that we hold about you is accurate, up-to-date, complete, and relevant. If you want to access your information, or feel that the information we currently hold about you is incorrect or incomplete, you can request us to:

- Provide copies of your information;
- Correct any inaccurate or incomplete information;
- Complete or update your information where appropriate; or
- Block or delete information where its collection, use, disclosure or retention is unlawful.

Depending on how and where you interact with us and to the extent provided by applicable laws, such as the European Union General Data Protection Regulation ("GDPR"), you may also have the rights to:

- Request that we delete your information;
- Restrict how we use your information;
- Object to particular ways we are using your information;
- Request that we provide your information in a machine-readable format and/or transfer your information to other organisations;
- Withdraw your consent for us to use your information if we are relying on your consent to use the information;
- Challenge our decisions made purely through automated processing, including profiling.

To exercise these rights, please use the contact details provided below. We'll need to confirm your identity and may ask you to fill out a request form before processing your request.

Please note that these rights do not apply in all situations and are subject to exceptions. If we refuse your information request, for example for legal or regulatory reasons, where required, we'll tell you why and provide you with information about how you can complain about the refusal.

11. COOKIES AND DIRECT MARKETING

We use cookies and similar technologies to collect information about your access to our website and other services we provide to you. Cookies are small pieces of information which use a unique identification tag and are stored on your device as you use our website or other services.

Most internet browsers are set up to accept cookies. If you don't want to receive cookies, you can change the settings of your browser to refuse cookies. However, we recommend that you allow cookies on our website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of the website and trading platform.

Where permitted by law or if you've provided consent, we may use your personal information to market or offer you products and services we believe may interest you. We may do this by either telephone, email, or SMS. Your consent will remain in effect until you tell us otherwise. The marketing communications we send you may relate to our products and services or, where permitted by law or consented by you, products or services of our related companies that we reasonably consider may be relevant to you.

If you no longer want to receive such communications altogether, please contact us using the details provided below. Alternatively, you can opt-out of our email and SMS marketing messages by using the unsubscribe link included in our communications.

12. HOW TO CONTACT US

If you have any questions about this Privacy Policy, want more details about how we handle your information, or would like to exercise one of your information rights, please contact our Data Protection Officer (DPO) at compliance.global@qbmarkets.com.

We offer a free internal complaint resolution scheme to all of our customers. If you have a complaint about how we've handled your information, please contact our DPO to discuss your concerns. We'll look into the complaint and do our best to address your concerns as quickly as possible.

If you're not satisfied with how our DPO responds to your concerns, you have the right to lodge a complaint with your local data protection supervisory authority at any time.

REVISION HISTORY

Version	Date	Section / Clause	Description of Amendment
1.0	16 September 2026	Entire Document	Initial version issued.