JUSTMARKETS PRIVACY AND COOKIES POLICY

Version: March 2026

1. WHO WE ARE

For this Privacy & Cookies Policy, the terms "JustMarkets," "we," "us," and "our" refer collectively to the following affiliated entities:

- Just Global Markets Ltd. (registration no. 8427198-1), Office 10, Floor 2, Vairam Building, Providence Industrial Estate, Providence, Mahé, Seychelles - a securities dealer regulated by the Seychelles Financial Services Authority (FSA) under Licence SD088.
- Just Global Markets (MU) Limited (registration no. 194590 GBC), The Cyberati Lounge, % Credentia International Management Ltd, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebène, Republic of Mauritius - an Investment Dealer (Full Service Dealer, Excluding Underwriting) regulated by the Mauritius Financial Services Commission (FSC) under Licence GB22200881.
- Just Global Markets (VG) Limited (registration no. 2139756) Trinity Chambers, P.O. Box 4301, Road Town, Tortola, British Virgin Islands, a company regulated by the Financial Services Commission (FSC) of the British Virgin Islands under an investment business licence number SIBA/L/24/1177.

2. SCOPE OF THIS POLICY

This Policy applies to all websites, client portals, mobile or desktop applications, marketing pages and any other online service operated by the Company (collectively, the "Services"). It explains:

- What personal data do we collect;
- Why do we collect it, and what legal bases do we rely on;
- With whom we share it;
- How long will we keep it, and how will we protect it;
- Your rights, and
- Our use of cookies and similar tracking technologies.

3. THE DATA WE COLLECT

We may collect, use, store and share different categories of personal data about you, including (but not limited to) the following:

- Identity particulars – full name, chosen username or other unique handle, salutation, birth date and birthplace, gender, nationality, and country of habitual residence.
- Contact details – home or invoicing address, shipping address, email, and all telephone numbers you provide.
- Verification (KYC) information – data found in, or derived from, passports, national IDs, driving licences; proof-of-address documents such as utility bills; evidence of source of funds (for example, payslips or tax returns); plus outcomes of credit, sanctions or watch-list screenings.
- Economic/financial profile – information on assets, income, overall financial standing, origin of wealth, employment situation, occupation and industry, together with bank-account identifiers, statement snapshots, e-wallet references and card numbers (truncated).
- Education & career background – academic history, professional credentials, job title, current employer and related nationality information.

- Contract data – records that document the products or services you have asked for or that we supply to you.
- Trading-related data – purpose for opening an account, prior trading experience, risk appetite and profile, plus your trade history and open or closed positions.
- Payment & transaction records – incoming and outgoing payment details, funding and withdrawal channels, the objective and size of each transfer, and any goods or services obtained.
- Government-identifier data – tax ID numbers, tax-residence jurisdictions and similar official identifiers.
- Consent & preference records – logs of marketing permissions, cookie choices and any other consents you grant to the Company.
- Technical diagnostics – IP addresses, login time stamps, browser versions, time-zone and locale data, plug-in versions, operating-system and platform details, as well as device identifiers used to reach our websites, apps or electronic tools.
- Communication content – letters, emails, chat transcripts and phone recordings, plus your stated preferences concerning the marketing messages you wish to receive.
- Usage metrics – analytics on how you browse, navigate and interact with our websites, mobile apps, services and features.

4. HOW WE USE YOUR DATA

We process the personal data described above to run our business, deliver the products and services you request, and meet our regulatory obligations. In particular, we use your information to:

- Create and maintain your account – this includes checking that the details you give us are accurate, performing identity verification and "know-your-customer" (KYC) checks, and setting up secure login credentials.
- Provide trading and payment services – we rely on your data to let you fund or withdraw from your account, execute and settle trades, generate statements, and offer ongoing customer support.
- Monitor risk and comply with law – we screen transactions and account activity to combat fraud, money laundering, sanctions breaches and other illicit behaviour, and we prepare the regulatory reports that local authorities require.
- Improve and personalise our offerings – usage statistics, crash logs, and feedback help us troubleshoot problems, develop new features, tailor the platform to your preferences and keep the website, apps and interfaces performing smoothly.
- Keep you informed – we may send service notifications, product updates, security alerts or responses to your enquiries, as well as market commentary and educational materials you choose to receive.
- Conduct marketing and promotions – with your permission, we use contact details, preference data and certain cookies or mobile identifiers to provide targeted offers, newsletters and advertising that may interest you. You can opt out of marketing at any time. Protect our legal rights – we store and analyse data to enforce our terms and policies, collect debts, resolve disputes, defend against claims and cooperate with lawful requests from courts and regulators.
- We never sell your personal data. Whenever we share information with trusted service providers, such as KYC vendors, payment processors, cloud hosts, or analytics platforms, we do so under strict confidentiality and security obligations that limit their use of the data to the purposes outlined above.

5. INFORMATION PROTECTION

The company uses advanced technology to protect personal data. The Company has put in place appropriate security measures to prevent accidental loss, use, unauthorised access, modification or disclosure of personal data. The Company employees maintain strict standards in the process of transferring information within the Company.

The Company limits access to your personal data to those employees who require access to limited data of Clients, and only specific categories of employees have full access to personal data of Clients (e.g. verification or account managers).

Any information and access will be encrypted using SSL technology. Where the Company has given to the Client (or where the Client has chosen) a password which enables the Client to access certain parts of the Company's website, the Client is responsible for keeping this password confidential. The Company will not ask the Client to share their password with anyone.

The Company shall ensure to implement reasonable and appropriate organisational, physical and technical measures to protect your personal data and shall inform you of any breaches resulting from unauthorised disclosure of your personal data. In the event of such a breach, the Company shall also notify the Regulatory Authority.

6. RETENTION PERIOD

The retention period for personal data storage is 7 years. After the retention period has passed, the Company has the right to remove all data which was received from the Client when it considers that personal information is no longer necessary for the purpose for which it was collected.

The Company may keep personal data for over 7 years for legal, regulatory, or technical reasons.

7. DISCLOSURE OF INFORMATION TO THIRD PARTIES

We may share your personal information with other entities within the JustMarkets group, as well as with service providers involved in delivering products or services to you - for example, authentication and payment service providers. We may also disclose information to third parties that support our business operations, such as outsourced compliance services, website hosting and analytics providers, and our banking partners.

In certain cases, we or these third parties may also share personal data with external auditors for the purpose of auditing accounts, or with professional advisors such as lawyers or consultants. In all such instances, recipients are bound by strict confidentiality obligations.

We share information only as necessary to comply with our legal obligations, and we ensure that confidentiality and security are maintained when transferring your data to third parties.

The Company may provide information about the Client to third parties only under special circumstances. Such circumstances may be:

- Protection of personal rights and property in the court;
- Implementing the court orders;
- Providing information to law enforcement authorities at official request;
- Transferring of information to business partners (trustees) to improve the quality of service.

On certain occasions, full personal information will be shared to improve the quality of service.

At the request of the Client, the Company can provide information about the services that the partners provide for it.

GMFT Services Ltd (HE 424491, Syrakouson 9, Office 106, 3077, Limassol, Cyprus) (hereinafter – the "Merchant Company") is the EU merchant company which provides certain content and operates the business including in terms of processing payment transactions the Client will make to the Company under this Agreement.

The Merchant Company acts as a payment and processing agent and may be involved in the processing of payment transactions made by Clients to the Company under the applicable agreements.

In connection with payment processing, the Company may share certain Clients' personal data with the Merchant Company strictly to the extent necessary to facilitate and process such transactions.

The Merchant Company processes Clients' personal data solely for the purposes of payment processing, transaction administration, compliance with applicable legal and regulatory obligations, and prevention of fraud and financial crime.

We monitor the data used by agents and third parties to ensure compliance with our confidentiality and data protection policies, safeguarding against any misuse of information. The Company retains full access to all data handled by these agents or third parties at all times.

8. COOKIES AND SIMILAR TECHNOLOGIES

The Company uses cookies, software-development kits (SDKs), pixel tags, local storage objects and comparable technologies (collectively, "Cookies") on JustMarkets.com and any sub-domains (the "Site"). We place first-party Cookies ourselves and allow carefully selected partners to place third-party Cookies, always in accordance with the choices you set in our Cookie Preference Centre or in your browser.

Cookies are small text files that a website saves on your computer or mobile device so it can recognise that device later. They store information such as pages viewed, language preference, time of visit or advertising interactions. Cookies placed only by the Company are "first-party"; those set by service providers (e.g., analytics or advertising networks) are "third-party".

Cookies let us:

- Route traffic securely, authenticate sessions and prevent fraud;
- Remember your settings (for example, interface language);
- Analyse how the Site is used so we can improve content and performance;
- Personalise content and advertising so it is more relevant to you; and
- Measure the effectiveness of our marketing campaigns.

We employ cookies, software-development kits (SDKs), pixel tags, local-storage objects and comparable tracking technologies (collectively, "Cookies") to recognise your browser or device, maintain sessions, enhance security, perform analytics and deliver personalised content. Cookies are small text files or code snippets; they cannot execute programs or convey malware.

Categories of Cookies We Use:

Category	**Purpose**
Strictly Necessary	Operate the Site, enable login, set privacy preferences, and prevent fraud.
Performance / Analytics	Count visits, diagnose errors, and understand navigation patterns.
Functionality	Remember, choices such as language or region enable enhanced features.
Targeting / Advertising	Build interest profiles, limit ad frequency, and gauge campaigns.

We do not keep Cookies longer than necessary: lifespans range from the current session to 12 months, after which the Cookie is automatically deleted or renewed only with your active consent.

If you need step-by-step instructions for adjusting or removing cookies in your browser, please refer to the independent guide at aboutcookies.org.

Trusted processors-such as Google, Meta, Microsoft Advertising and X (Twitter), may place Cookies for analytics, fraud prevention and advertising on our behalf. Each processor acts under a written data-processing agreement and must implement security safeguards equivalent to ours.

Your decision to keep using or navigating the Site without changing your browser or Cookie controls shall be deemed confirmation that you agree to our placement and use of Cookies as described in this Policy.

9. SERVICES WE USE (THIRD-PARTY PROVIDERS)

To operate, secure and continuously improve the User Experience, we rely on a limited set of trusted third-party service providers ("Service Providers").

Where these integrations involve transfers of data outside your country of residence, we implement appropriate safeguards such as Standard Contractual Clauses or other approved transfer mechanisms. By using the App, you acknowledge that your information may be processed by the Service Providers listed here, and you are encouraged to review their respective privacy policies.

Service Provider	Main Purpose(s)
Google Privacy Policy	Core mobile device functionality, in-app billing, push notifications
Google Analytics for Firebase	Aggregated usage analytics, event tracking
Google Cloud Data Processing Addendum	Maintain reCAPTCHA functionality
Firebase Crashlytics	Real-time event reporting and diagnostics
Facebook	Social login, advertising attribution, behavioural analytics
Amplitude	Product analytics, funnel analysis, and retention metrics
AppsFlyer	Install attribution, cohort analysis, and fraud detection
OpenAI	Automated request processing, and response optimization
Trustpilot	Collection, display, and verification of user reviews regarding our services and products

10. CHANGES OF PERSONAL INFORMATION

Because the Company assumes that all the information is full and relevant, the Company asks the Client to notify the Company of any changes in the personal data via the appropriate forms in the Personal Area.

11. YOUR RIGHTS

- Access & copy of your data
- Rectification of inaccurate or incomplete data
- Erasure ("right to be forgotten"), where legally possible
- Restriction or objection to processing in certain cases
- Portability of the data you provided in a structured, commonly used format
- Withdrawal of consent at any time (for marketing / non-essential cookies)

If you do not want us to use your personal data, you must inform the Company by sending an email to support@justmarkets.com. The Company will not be able to continue to provide services and information requested by the Client if the Client makes such a decision.

12. UPDATES TO THIS POLICY

From time to time, the Company has the right to update this Policy to ensure that any new services, requirements, and technologies, as well as any changes to our business operations and legislation, are taken into consideration. In case of any updates to this Policy, the Company will post the changes to this Policy and inform Clients via the Company's website and/or by sending an email.