

Privacy Policy

Version 1.0 – September 2025



By accepting this Privacy Policy document, you acknowledge and confirm that our official legally binding language is English. In the event of any discrepancy or inconsistency between any documentation, information, and communications in any other language other than English, the English documentation, information, and communications shall prevail.

Our Commitment to You

Thank you for showing interest in our service. 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 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.

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 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.

How do we receive information about you?

We receive your Personal Information from various sources:

- 1. When you voluntarily provide us your personal details in order to create a Peaksight Ltd account (for example, your name and email address);
- When you use or access our site and services, in connection with your use of our services (for example, your financial transactions);
- 3. 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?

In order to open an Peaksight Ltd 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 Data about you:



- <u>Registration data</u> your name, email address, phone number, occupation, country of residency, and your age (in order to verify you are over 18 years of age and eligible to participate in our service).
- <u>Voluntary data</u> 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 data you provided us with.
- <u>Financial data</u> by its nature, your use of our services includes financial transactions, thus requiring us to obtain your financial details, which includes, but not limited to your payment details (such as bank account details and financial transactions performed through our services).
- <u>Technical data</u> we collect certain technical data that is automatically recorded when you use ourservices, such as your IP address, MAC address, device approximate location
- Special Categories of Data: In the context of AML/KYC obligations, Peaksight Ltd. may process special categories of personal data, such as information indicating politically exposed person (PEP) status, source of funds, or other sensitive identifiers required for enhanced due diligence. Processing such data is conducted under Article 9(2)(g) GDPR (substantial public interest and compliance with legal obligations) and CySEC's AML directives. Peaksight Ltd. applies additional safeguards, including restricted access, encryption, and secure retention practices, to ensure the highest level of protection.

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 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 informationwill 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 mergeinformation 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 our Tracking Technologies please visit our <u>Cookie Policy</u> page.



How do we use the information we collect?

- <u>Provision of service</u> we will use your Personal Data you provide us for the provision and improvement of our services to you.
- Marketing purposes we will use your Personal Data (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and 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 Data, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clickingon 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 data for marketing purposes, you may opt-out in accordance with this "Opt-out" section. 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 fulfill your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your personal data are authorized to use your Personal Data only as necessary to provide these non-marketing services.
- 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.
- <u>Protecting our interests</u> we use your Personal Data when we believe it's necessary in
 order to take precautions against liabilities, investigate and defend ourselves against any
 third-party claimsor allegations, investigate and protect ourselves from fraud, protect the
 security or integrity of our services and protect the rights and property Peaksight Ltd, its
 users and/or partners.
- **Enforcing of policies** we use your Personal Data in order to enforce our policies, including but limited to our Terms, or Client Agreement.
- Compliance with legal and regulatory requirements we also use your Personal Data in order to perform our regulatory requirements such as client identification or due diligence as stated in the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007-2018 and Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing, or to comply with our obligations regarding the Investment Services and Activities and Regulated Markets Law of 2017, Regulation (EU) No 600/2014, the Directive 2014/57/EU and the Regulation (EU) No 596/2014, or to comply with a subpoena or similar legal process.



With whom do we share your personal information?

- <u>Internal concerned parties</u> we share your data with companies in our group, as well as our employees limited to those employees or partners who need to know the information in order toprovide you with our services.
- <u>Financial providers and payment processors</u> we share your financial data about you for purposesof accepting deposits or performing risk analysis.
- <u>Business partners</u> we share your data 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 data in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement, take precautionsagainst 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 Peaksight Ltd, its users and/or partners. We may also disclose your personal data where requested by our supervisor (the Cyprus Securities and Exchange Commission License 440/23 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 data 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 data 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 EEA. In such cases we will transfer yourdata only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

Cross-Border Processing: Personal data may be transferred or accessed outside the European Economic Area (EEA), including third countries where data protection laws may differ. In accordance with CySEC requirements and Chapter V of the GDPR, Peaksight Ltd. shall notify clients whenever their data may be processed outside the EEA and will ensure that appropriate safeguards (such as EU Standard Contractual Clauses or adequacy decisions) are in place to protect personal data.

How we protect your information

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. We use 'Secure Socket Layer (SSL)' as well as 'Transport Layer Security (TLS)' encryption technologies in order to protect the information that is being submitted to us by you. Your information is stored on secure servers and isn't publicly available. We limitaccess of your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us.



You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for alluse of your password and your account, including any unauthorized use.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Information, we cannot ensure orwarrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

Incident Management and Breach Notification

Data Breach Response: In the event of a personal data breach, Peaksight Ltd. will follow a formal incident response process, including:

- Immediate containment and assessment of the breach.
- Notification to the Office of the Commissioner for Personal Data Protection and, where applicable, CySEC, within 72 hours, in accordance with Articles 33–34 GDPR.
- Prompt communication to affected clients where there is a high risk to their rights and freedoms, detailing the nature of the breach, potential consequences, and mitigation measures taken.
- Documentation of all incidents for audit and continuous improvement.

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 taking into account 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. We will keep records containing client personal data, trading information, account opening documents, communications and anything else for at least 5 years and up to another 5 years (where it is requested by CySEC) from the end of our business relationship, as required by the Investment Services and Activities and Regulated Markets Law of 2017, the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007-2018 and Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing.

Records of Processing Activities (RoPA): The company maintains comprehensive Records of Processing Activities under Article 30 GDPR. These records include:

- The purposes of processing and categories of data subjects.
- All categories of personal data processed (including AML/KYC data).
- Categories of recipients and details of any cross-border transfers.
- Retention periods, security measures, and lawful bases for processing.
 Records are kept in writing, including electronic form, and are available for inspection by



CySEC or the Commissioner for Personal Data Protection upon request. RoPA ensures accountability and demonstrates compliance during audits or inspections.

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 you directly volunteer to us 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 legitimateinterests 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@peaksightltd.com

Attn.

DPO

Peaksight Ltd

Registration Number: HE433420

If you decide to terminate your account, you may do so by emailing us compliance@peaksightltd.com 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 accessiblevia your account.

CONTACT DETAILS OF THE COMMISSIONER OF PERSONAL DATA PROTECTION

The Commissioner for personal data protection is an independent public authority responsible formonitoring the implementation of Regulation (EU) 2016/679 (GDPR) and other laws aiming at



the protection of individuals with regards to the processing of their personal data.

If you have contacted our DPO and your concerns were not addressed, you may lodge a complaint with the Commissioner. For lodging a complaint, you are requested to fill in one of the forms that can be found here, depending on the case, and send it to the Commissioner

Website: http://www.dataprotection.gov.cy/

Email: commissioner@dataprotection.gov.cy

Postal address: P.O.Box 23378, 1682

Nicosia, CyprusTelephone: +357 22818456

Fax: +357 22304565

Updates to this Policy

This Privacy Policy is subject to changes from time to time, at our sole discretion. The most current versionwill 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.