

**Privacy Policy**  
**Solaris EMEA Ltd.**  
**October 2023**

## WHAT THIS POLICY IS ABOUT

Solaris EMEA Limited recognises the importance of your privacy and understands your concerns about the security of your personal information. We are committed to ensuring that when you share information with us, or we collect information about those who visit our websites, we do so in accordance with applicable privacy laws.

This privacy policy details how we generally collect, hold, use and disclose personal information and your rights in relation to the personal information that we hold about you.

Any reference to 'us', 'our', 'we' or 'Axi' in this privacy policy is a reference to Solaris EMEA Limited and the brand names attributed to us as the context requires unless otherwise stated.

Axi is committed to its privacy obligations under the principles contained in the European Union GDPR ('General Data Protection Regulation' or 'GDPR') (as amended).

Axi is the "Data Controller" as defined by the GDPR. Axi has appointed a Data Privacy Officer who can be reached at [compliance.eu@axi.com](mailto:compliance.eu@axi.com) though your initial point of contact should be our Customer Service team, who can be contacted at [service.eu@axi.com](mailto:service.eu@axi.com).

## WHAT IS PERSONAL DATA?

Personal data includes any information or opinion, about an identified living individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal data whether it is true or not and whether it is recorded in a material form or not.

## RIGHT TO OBJECT

Clients have the right to object to their personal data being used for:

- direct marketing.
- processing based on legitimate interests or the performance of a task in the public interest or in relation to an official authority.
- processing for statistical purposes.

As stated in this privacy policy, clients have the ability to opt out of direct marketing and deal with private data held by Axi in different ways.

## WHAT KINDS OF PERSONAL DATA DO WE COLLECT?

When you apply for or maintain an account with Axi, we collect personal data about you. The personal data we collect about you may include:

- Information you provide to us on applications and other forms, such as your name, address, date of birth, occupation, employer, assets and income, telephone or mobile number, email address and bank account details;

- Information about your transactions with us and with our affiliates;
- Information we receive from other entities not affiliated with Axi; and Information you provide to us to verify your identity, such as a passport, or information and documents received from other entities not affiliated with Axi.

## WHY WE COLLECT PERSONAL DATA

The products and services we provide usually fall under the scope of our regulated activities and as such we generally have obligations to ask for a range of personal information from you which could include your name, address, date of birth, gender, contact details, occupation, income, assets and liabilities, bank account details, trading history or statements, financial statements, credit reporting information, employment details, location data or any other similar information which could be used to identify you.

We collect, hold, use and disclose personal data for business purposes, such as evaluating your application to open account, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing client service.

## DIRECT MARKETING

We may use your personal data to offer you products and services that we believe may interest you. We will not do this if you tell us not to. If you do not wish to receive marketing offers from us, please send an email to us at [service.eu@axi.com](mailto:service.eu@axi.com)

## HOW WE COLLECT PERSONAL DATA

We obtain most of the information directly from you through application forms or telephone conversations, and from maintaining records of information obtained in the course of ongoing customer service. We may also obtain information from other sources, such as via identity checks.

We may also obtain information about you through your use of our websites, apps or through the use of cookies on our websites.

Sometimes we may ask for other information voluntarily (including through market research, surveys or special offers) so that we can improve our service or better cater to the wider needs of our current and future clients.

We may record communications that we have with you in relation to the services we provide to you and our relationship with you. These recordings may be in electronic format, by telephone, in person or otherwise and will be our sole property, constituting evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or other notice.

If you choose not to provide the information we request, we may not be able to provide you with the product or service you need, or open your trading account.

## YOUR CONSENT

By providing us with information about yourself through any of our websites, application forms, via telephone or otherwise, you consent to the collection, use, disclosure and transfer of that information as set out in this privacy policy. By using our websites you also consent to our use of cookies as set out in this privacy policy.

If you apply to open a trading account (live or demo) your application form (whether written or electronic, or in any other form (including verbal) will constitute your express consent to the use and (in certain circumstances) the disclosure of your personal information.

You also consent to the use of your data to carry out an “Appropriateness Test” when applying for an account, so that the suitability of any of our products provided to you can be assessed.

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this privacy policy, along with your acceptance of these terms in the account opening process.

## HOW WE PROTECT PERSONAL DATA

We take our obligations to protect your personal information very seriously and as such we take reasonable steps to hold information securely in electronic or physical form. These steps are supported by a number of security standards, processes and procedures, and we store information in access-controlled premises or in electronic databases requiring logins and passwords.

The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services and any transmission is at your own risk.

To try to prevent this, we use both GeoTrust Secure Socket Layer (SSL) and Transport Layer Security (TLS) encryption technology in order to protect the information that you submit to us. This type of technology is designed to protect you from having your information intercepted by anyone other than Axi during its transmission. We also use other safeguards such as firewalls, authentication systems (e.g. passwords and personal identification numbers) and access control mechanisms to restrict unauthorised access to systems and data.

Once we have received your information, we will take reasonable steps to use procedures and security features to prevent unauthorised access, modification or disclosure.

We use a combination of secure computer storage facilities and paper-based files and other records and, irrespective of the format of the information, take steps to protect the personal information we hold from interference, misuse, loss, unauthorised access, modification or unauthorised disclosure.

Some electronic communications, through non-secure web platforms may not be secure, virus-free or successfully delivered. If you communicate with us using non-secure web platforms, you assume the risks that such communications between us can be intercepted, not received, delayed, corrupted or, received by persons other than the intended recipient.

You can help us to keep your information secure. Remember that any username or password in relation to our websites is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

## WHO WE DISCLOSE PERSONAL DATA TO

We use the information you give us to assess your application, conduct identity checks, verify you and do anything else necessary in order to open your trading account. This includes conducting screening checks in accordance with our obligations under relevant anti money laundering laws and other regulatory laws.

Once this process is complete, the information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing our customer service and products and giving you information on any opportunities that we believe may be relevant to you.

We may also use your personal information for the future planning of our business, including product development and research. In such instances (and in instances where we have legal or regulatory obligations), and depending upon particular restrictions on sensitive information, you consent to the disclosure of your personal information where we disclose that information to:

1. relevant regulators or government authority as required, authorised, permitted or compelled by law;
2. where applicable, anyone authorised by you (for example, your financial adviser);
3. an introducing broker, referrer, or third-party broker or agent who may have introduced or referred you to us (this is necessary in order to pay fees or commissions for such a referral and can include any click-through links you may have clicked on); and
4. third party service providers, including those who help facilitate or support our business, or develop new software to run our business more efficiently (these could include specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, taxation, insurance, research or other services).

Where we share your personal data in the ways set out above, you acknowledge and understand that this may result in your personal data being sent outside Europe. Where this occurs, whilst we make reasonable attempts, you acknowledge that we may not be able to extract an undertaking from overseas recipients that they will comply with European privacy laws and further, the ability to enforce European privacy laws or any other contractual privacy obligations in relation

to any breach may be very limited. As such, we will not be accountable for any breach of those laws by an overseas recipient.

Because European privacy law may not apply or be enforceable against some overseas recipients, we understand you may choose not to disclose your personal information to us. If you choose not to provide this information, we may not be able to open your trading account or provide you with the product or service you have requested.

## SHARING INFORMATION WITH OUR AFFILIATES

We may share personal data described above with our affiliates for business purposes, such as servicing client accounts and informing clients about new products and services, as permitted by applicable law. Our affiliates are companies controlled or owned by us, or companies controlling or under common control with us, and include financial service companies, such as dealers, other brokers, futures commission merchants and advisors.

## DISCLOSURE TO NON-AFFILIATED THIRD PARTIES AND REGULATORY BODIES

In order to support the financial products and services we provide to you, we may share the personal data described above with third-party service providers and joint marketers not affiliated with us, including:

- financial service institutions (advisors, dealers, brokers, trust companies and banks) with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and
- companies under contract to perform services for us or on our behalf, such as service providers that prepare statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and marketing services.

These companies acting on our behalf are required to keep your personal data confidential.

We may also be required to provide your personal data to law enforcement agencies and other regulatory and government bodies from time to time in the Cyprus and overseas.

## ABOUT COOKIES

Axi collects the information from you electronically when you visit our websites, including date and time of visit, number of pages viewed, how you navigate through our websites.

Cookies are small files containing information that a website uses to track its visitors. Axi may set and access Axi cookies on your computer, enabling us to learn which advertisements and promotions bring users to our website. Axi or any of its affiliates or divisions may use such cookies.

Axi uses cookies to capture data to help us improve the service offered and to make improvements in relation to the quality of content contained on our websites.

You can choose whether to accept cookies or not on your computer.

## ABOUT HYPERLINKS

Axi's website(s) may contain hyperlinks or links to other sites, and other sites may link to our sites. These websites that may be linking to or from Axi's sites may have their own privacy policies. Axi's privacy policy applies exclusively to Axi and information collected by us. Axi is not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you understand that this information is going to a third-party, and you should become familiar with the privacy policy provided by that third-party.

## ACCESSING AND UPDATING YOUR PERSONAL DATA

You have the right to request a copy of the personal data that we hold about you, in order to correct any inaccuracies and to object to our using your personal data for marketing purposes, and this is known as a "Subject Access Request".

To do this, you should contact us using the details set out below in the "Contact Us" section. There are no fees for requesting that your personal information be corrected, however in processing your request, our reasonable costs may be recovered if necessary if the relevant legislation allows. This may cover such things as locating the information and supplying it to you.

Where we refuse to action your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

## DATA ERASURE

Known as the 'right to be forgotten' you may request that we delete all personal data about you which we hold, although we are limited by the law with regards to whom this applies.

The conditions for erasure, as outlined in article 17 of GDPR, include the data no longer being relevant to original purposes for processing, or clients withdrawing consent.

For Axi, this only applies to data held for non-live accounts. We are legally obligated NOT to delete any data for clients who have had live accounts with us for at least 7 years.

## DATA PORTABILITY

GDPR introduces data portability, which is the right for a client to receive the personal data concerning them, which they have previously provided, in a 'commonly used and machine-readable format' and have the right to transmit that data to another data controller. This means that if requested by a client Axi will put all their data onto a "comma-separated values" (or CSV file) and, if requested, send that file to another company.

## SUMMARY

With the introduction of the GDPR you have additional rights with regard to your personal data. Some of these may not be applicable to you due to additional regulatory obligations placed upon us which we are required to meet for all live accounts that have been opened.

- **Right to be informed**  
You have the right to be informed about what we do with your personal data, which is why we have made this privacy policy available to you on our website.
- **Access to your personal data**  
You have the right to request a copy of the personal information that we hold about you, and, if you wish to exercise that right, please contact [Compliance.Emails@axi.com](mailto:Compliance.Emails@axi.com)
- **Correction of personal data**  
You can make a request for us to correct any personal data that we are processing about you which is incorrect.
- **Right of erasure**  
You can request that we erase your personal data if there is no reason for us to continue using it. This right only applies in certain circumstances, and it is not a guaranteed or absolute right, as we have regulatory and legal obligations in certain circumstances to continue holding personal data for at least 7 years.
- **Right to data portability**  
This right allows you to obtain a copy of your personal data which we hold in a format that will enable you or us to transfer it to another organisation. Multiple requests of this type may incur a fee to cover reasonable expenses.
- **Right to restrict processing of personal data**  
You have the right in certain circumstances to request that we suspend our processing of your personal data. For example, you have the right to opt out of Marketing emails. Where we suspend our processing of your personal data we will still be permitted to store your personal data, but any other processing of this information will require your consent, subject to certain exemptions.
- **Right to object to processing of personal data**  
You have the right to object to our use of your personal data which is processed on the basis of our legitimate interests. However, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so or we need to process your personal data in connection with any legal claims.
- **Rights relating to automated decision making and profiling**  
You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request that we involve one of our employees or representatives in the decision-making process.



## PRIVACY COMPLAINTS

If you believe that a breach of your privacy has occurred or are concerned about how your personal data is being handled, please contact us using the details below:

### **Contact Us**

The Data Privacy Officer  
Solaris EMEA Limited  
Anexartias 187  
Soho Office,  
2nd Floor, 3040 Limassol, Cyprus.

Email: [compliance.eu@axi.com](mailto:compliance.eu@axi.com)

Phone: +357 250 30 932