MEGA EQUITY

SECURITIES & FINANCIAL SERVICES PUBLIC LTD

Data Privacy Policy

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1. Scope

1.1. Mega Equity Securities and Financial Services Public Ltd (the "Company") has developed and adopted this Data Privacy Policy and is committed to protecting and respecting your personal data, handling it in an open and transparent manner. We are a Cyprus Investment Firm authorised by the Cyprus Securities and Exchange Commission (CySEC, licence no. 011/03), with our registered office at 42-44 Griva Digenis, 1080 Nicosia, Cyprus. This Policy is issued under Regulation (EU) 2016/679 (the General Data Protection Regulation, "GDPR") and Cyprus Law 125(I)/2018.

1.2. This Policy is provided to clients (the "Client") together with the Client Agreement and is also available on our website.

1.3. This Privacy Policy is addressed to existing and prospective clients, website visitors, and the representatives, officers, shareholders and beneficial owners of our corporate clients, and explains the types of personal data we may collect about you before and during the provision of our services. It also describes how we use, share, and safeguard your personal data, as well as your rights regarding its processing and how you can exercise them.

1.4. The personal data that we collect and process depend on the specific service or product requested and agreed upon in each case. Such data are collected and processed where necessary for the performance of our contractual obligations, or to comply with applicable laws, regulations, and European directives to which the Company is subject. Your personal data will not be used for any other purpose unless you have provided your explicit consent (via a Consent Letter).

1.5. By accessing our website or contacting us through any of our communication channels, you acknowledge that you have read and understood the terms of this Policy and how we process the personal data you provide prior to becoming a client. Once you open an account with us, this Policy – including any future amendments – will govern how we collect, store, use, share, and otherwise process your personal data, as well as your rights throughout and after our business relationship.

1.6. Our Personal Data Protection Policy governs the collection, use, and storage of your personal data. You may review the full Policy on our website at www.megaequity.com

2. Types of Personal Data We Collect and Maintain

2.1. Our Company acts as the Data Controller of the personal data you (the data subject) provide to us. In this capacity, we determine the purposes and means of processing your personal information.

2.2. We collect and process the following categories of personal data from you, depending on whether you are a natural or legal person:

2.2.1. Natural Person (Individual Clients / Prospective Clients / Authorised Representative, Officer, Shareholder or Beneficial Owner of a legal entity)

- Full name;
- Date of Birth and place;
- Gender;
- Contact details (Phone, Email, Address, Fax);
- IP Address, device specifications and other information relating to your brokerage experience;
- National identity card / Passport / Driver's licence;
- Tax identification number (TIN);
- Tax residency and other FATCA/CRS information (US Foreign Account Tax Compliance Act /EU Common Reporting Standard)
- Marital status / Family status;
- Information relating to whether you hold or have held a prominent public function (Politically Exposed Person – PEP);
- Utility bills;
- Educational information;
- Profession and employment details;
- Financial information including details about your assets and liabilities, account balances, trading statements, tax and financial statements;
- Knowledge and experience in trading and risk appetite/profile;
- Records of your transactions and trading behaviour such as products you trade with us, preference for certain types of products and services, historical data of your activity, financial instructions, and transactions;
- Authentication data (e.g. signature);
- Recorded telephone conversations, electronic communications relating to orders, and minutes of meetings;
- Sanctions, PEP and adverse media screening results obtained from compliance data providers;
- Other information we consider necessary to our functions and activities;

2.2.2. Legal Person (Companies, Entities, Organisation)

- Name of legal entity;
- Address;
- Contact Details (Telephone, Fax, Email);
- Corporate documents;
- Tax residence and Tax Identification Number of the legal entity;
- Details of the legal entity's representatives and beneficial owners
- Full name;
- Date of Birth and place;
- Gender;
- Contact details (Phone, Email, Address, Fax);
- National identity card / Passport / Driver's licence;
- Tax residence and Tax identification number (TIN);
- Information relating to whether you hold or have held a prominent public function (Politically Exposed Person – PEP);
- Data obtained from entities providing regulatory compliance information (e.g. LexisNexis WorldCompliance);
- Knowledge and experience with shares and other financial instruments (both complex and non-complex);

- Financial information including details about your assets and liabilities, account; balances, trading statements, tax and financial statements;
- Investment strategy, scope, and risk appetite;
- Personal investment portfolio and objectives;
- Recorded telephone conversations, orders, and minutes of meetings;
- Other information we consider necessary to our functions and activities;

2.3. In addition to the information you provide directly to us, we may also collect and process personal data from publicly available sources such as the Department of Registrar of Companies and Official Receiver, commercial registers, the internet and compliance data providers, where such data are lawfully obtained and we are permitted to process them.

2.4. Where a corporate client provides us with personal data about its representatives, officers, shareholders or beneficial owners, the client should make this Policy available to them.

2.5. Providing the personal data listed above is a legal and contractual requirement. If you do not provide it, we cannot open or maintain your account.

2.6. Our anti-money laundering, sanctions and adverse media screening may reveal information about criminal convictions or offences, and PEP screening may indirectly reveal information about political opinions. We process such data only where authorised by EU or Cyprus law, in particular the Prevention and Suppression of Money Laundering and Terrorist Financing Law, in accordance with Articles 9(2)(g) and 10 GDPR.

3. Purpose of Collecting and Processing Personal Data

3.1. We collect and process your personal data to provide our services effectively, comply with legal and regulatory obligations, and protect our legitimate business interests. Specifically, your personal data may be processed for the following purposes:

3.1.1. Performance of a contract (Article 6(1)(b) GDPR):

We process personal data to provide investment and ancillary services in accordance with our contractual obligations to clients and to complete the necessary onboarding and acceptance procedures prior to entering into a contract with prospective clients. The purpose of processing may vary depending on the type of service or product requested. Details relating to the relevant purposes are set out in the applicable contract terms and conditions.

3.1.2. Compliance with Legal Obligations (Article 6(1)(c) GDPR)

We are required to process certain personal data to comply with our legal and regulatory obligations under applicable laws and supervisory requirements, including but not limited to the Prevention and Suppression of Money Laundering and Terrorist Financing Law, the Investment Services and Activities and Regulated Markets Law, and relevant Tax Laws. We are also subject to the oversight of various regulatory authorities, including the Cyprus Securities and Exchange Commission (CySEC). Such obligations may involve processing personal data for:

1. Verifying identity and conducting due diligence
2. Complying with court orders or other legal requirements
3. Fulfilling tax reporting obligations
4. Assessing suitability and appropriateness, and categorising clients
5. Recording telephone conversations and electronic communications relating to orders

6. Implementing anti-money laundering and counter-terrorism financing controls.

3.1.3. Safeguarding and Serving Legitimate Interests (Article 6(1)(f) GDPR)

We may process personal data to safeguard the legitimate interests pursued by the Company or by third parties, provided that such interests do not override your fundamental rights and freedoms. You have the right to object at any time to processing based on our legitimate interests (see section 8).

Examples include:

- Ensuring the security of the Company's IT systems and infrastructure;
- Preventing fraud, criminal activity, and unauthorised access;
- Managing Company risks and business continuity;
- Sharing personal data for verification and updates in accordance with the anti-money laundering compliance framework;
- Initiating or defending legal claims and participating in legal proceedings;
- Sending existing clients information about our similar services (you may object at any time, see section 8);

4. Processing Based on Your Consent

4.1. We may process your personal data for different purposes, depending on the context, based on one or more lawful bases. These lawful bases include:

- Performing our contractual obligations to you;
- Complying with applicable legal and regulatory requirements;
- Pursuing our legitimate interests.

4.2. If the processing of your personal data does not fall under one of these lawful bases, we will seek your consent. Such consent must be freely given, and you have the right to withdraw it at any time by contacting us using the details provided in this Policy or by unsubscribing from our email communications. Withdrawal of consent does not affect processing carried out before it.

4.3. We may use personal data you provide through our website, other interactions, or during our business relationship to communicate with you for marketing purposes, promotional offers, market news, and analytical reports. Communications may be sent via phone, email, SMS, push notifications, or through your online account portal.

4.4. You can unsubscribe from these communications at any time through your online account portal, by using the unsubscribe link in any email or by contacting us at info@megaequity.com.

5. Use and Disclosure of Personal Data and International Transfers

5.1. Our main records are held at our offices at 42-44 Griva Digenis, 1080 Nicosia, Cyprus. Some of our service providers may process personal data outside the European Economic Area (EEA), including in the United States. Where the recipient country does not benefit from a European Commission adequacy decision, we protect the transfer with the European Commission's Standard Contractual Clauses or, where the US recipient is certified, the EU-US Data Privacy Framework. You may request a copy of these safeguards using the contact details in section 8.3.

5.2. We do not provide third party access to your personal data, unless required by law, necessary for the provision of our services, or authorized under our contractual or statutory obligations, or if you have provided your consent. All data processors appointed by us to process personal data on our behalf are bound by a written agreement complying with Article 28 GDPR.

5.3. In the circumstances described above, recipients of personal data may include, for example:

- Supervisory and other regulatory and public authorities, where a statutory obligation exists, such as the Cyprus Securities and Exchange Commission, the Unit for Combating Money Laundering (MOKAS) and the income tax authorities;
- Other investment firms, management companies and depositaries, including custodians, depositaries and exchanges (including the Cyprus Stock Exchange and the Athens Stock Exchange);
- Entities supporting anti-money laundering and counter-terrorism financing procedures, such as LexisNexis WorldCompliance;
- External legal consultants;
- Auditors and accountants;
- File storage, archiving and/or records management companies;
- Technology and system providers, including companies that develop, maintain, or support our systems and assist in the effective delivery of our services, including trading platforms, email, cloud and productivity software providers and artificial intelligence tools;

5.4. All disclosures are made strictly in accordance with applicable laws and regulations, contractual obligations, and the purposes for which your data was collected.

5.5. We may use artificial intelligence (AI) tools to support our staff in processing personal data, for example to draft and summarise documents and communications, review client documentation, and assist with compliance and anti-money laundering checks. These tools are used only for the purposes and on the lawful bases set out in section 3. Our staff review AI outputs, and we do not use AI tools to make decisions with legal or similarly significant effects about you without human involvement (see section 8.2). Our AI providers act as data processors under written agreements complying with Article 28 GDPR and are not permitted to use your personal data to train their models. Where these providers process personal data outside the EEA, the safeguards described in section 5.1 apply.

6. Cookies

6.1. For details of the cookies we use and how to manage your consent, please see our Cookie Policy at www.megaequity.com.

7. Data Storage and Retention

7.1. The Company stores personal information using a combination of secure electronic systems, paper-based records, and other protected storage methods. We take all reasonable measures to protect the personal information we hold against misuse, loss, unauthorised access, alteration, or disclosure.

7.2. When personal data are no longer needed for the purposes for which they were collected, we will either remove identifying details or securely destroy the records, in accordance with our Data Retention Policy and applicable data protection laws.

7.3. Certain records, however, may need to be retained for an extended period due to legal and regulatory obligations. As a regulated investment firm, the Company is required under investment services, anti-money laundering, and related financial regulations to retain documents and evidence relating to:

- Client identity verification;
- Sources of income and wealth;
- Monitoring of transactions;
- Telephone, chat, and email communications;
- Orders, trades, and transaction history;
- Complaint handling records; and
- Documentation demonstrating compliance with regulatory conduct standards.

7.4. Such records are maintained for a minimum period of five (5) years after the termination of the business relationship, or for a longer period if required by our Regulators or other applicable legal obligations. For example, MiFID II records may be kept for up to seven (7) years where CySEC requests it.

7.5. For prospective clients (or authorised representatives, officers, or owners of a legal entity that is a prospective client), we retain personal data for six (6) months from the conclusion of all communications that did not result in the opening of an account with the Company.

7.6. We keep your preferences until you unsubscribe or object.

8. Your rights

8.1. Under the GDPR you have the right to:
(a) access your personal data and receive a copy;
(b) have inaccurate or incomplete data corrected;
(c) have your data erased where we no longer have a legal reason to keep it;
(d) restrict our processing of your data;
(e) receive the data you provided to us in a portable format;
(f) object to processing based on our legitimate interests;
(g) object at any time to direct marketing; and
(h) withdraw your consent at any time.
To exercise these rights, please contact us using the contact details in section 8.3. We will respond within one month. Some rights are limited by our legal record-keeping obligations, and we will tell you if this applies.

8.2. We do not make decisions with legal or similarly significant effects about you based solely on automated processing.

8.3. If you wish to raise a complaint regarding the handling of your personal data, please contact us by:

Phone: +357 22 711 711
Email: info@megaequity.com
In writing: 42-44 Griva Digenis, 1080 Nicosia, Cyprus

8.4. We will review your complaint and work with you to resolve the matter.

8.5. If you still feel that your personal data has not been handled appropriately according to the law, you have the right to file a complaint with the Office of the Commissioner for Personal Data Protection in Cyprus (www.dataprotection.gov.cy).

9. Policy Review and Updates

9.1. We may update this Policy from time to time, and it is important that you review it periodically for any changes. Any personal information we hold will be governed by the most recent version of this Policy. Should we make any material changes, we will inform you accordingly. We review this Policy at least once a year.

9.2. A copy of this Policy is available on our website and is also provided as part of the account opening documentation.

9.3. We recommend that you periodically review the Policy published on our website to stay informed about how we collect, process, and protect your personal information.