



## **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.
- 1.2. By agreeing to the terms of the Client Agreement, clients (the “Client”) also agree to the terms of this policy, which form part of the Client agreement.
- 1.3. This Privacy Policy is addressed to both existing and prospective 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, you agree that 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.

## 2. Types of Personal Data We Collect and Maintain

- 2.1. 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](http://www.megaequity.com).
- 2.2. 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.
- 2.3. We collect and process the following categories of personal data from you, depending on whether you are a natural or legal person:
  - 2.3.1. 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);
- Other information we consider necessary to our functions and activities;

#### 2.3.2. 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;

2.4. 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, where such data are lawfully obtained and we are permitted to process them.



### **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:**

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**

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

#### **3.1.3. Safeguarding and Serving Legitimate Interests**

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.

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;



## 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.

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 or by contacting us at [info@megaequity.com](mailto:info@megaequity.com).

## 5. Use and Disclosure of Personal Data

5.1. Your personal data is processed at the offices of our Company, located in Nicosia, Cyprus. Hosting and storage of your data takes place at 42-44 Griva Digenis, 1080 Nicosia P.O. Box: 23685, Nicosia, Cyprus.

5.2. We do not provide third party access to your personal data, unless specifically 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 contractually bound to comply with GDPR requirements.

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 and the income tax authorities;
- Other investment firms, management companies and depositaries, including custodians, depositaries and exchanges;
- 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;



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.

## 6. Cookies

6.1. A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this website. We do link the information we store in cookies to any personally identifiable information you submit while on our site.

6.2. The Company is using both session ID cookies and persistent cookies. A session ID cookie does expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. To remove persistent cookies, follow the directions provided in your Internet browser's "help" file.

## 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.

## 8. Your rights

8.1. If you believe that any personal data we hold about you is inaccurate or incomplete, you have the right to request access to this information, have it corrected, or request its deletion. To exercise these rights, please contact us.

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



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](mailto:info@megaequity.com)

In writing: 42-44 Griva Digenis, 1080 Nicosia, Cyprus

8.4. Your complaint will be reviewed 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.

## 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 Privacy Policy. Should we make any material changes, we will inform you accordingly and update the revision date indicated below in section 9.

9.2. A copy of this Privacy Statement 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 Privacy Statement published on our website to stay informed about how we collect, process, and protect your personal information.

**Note:** The General Data Protection Regulation (EU) 2016/679 shall apply from 25th May 2018. Until then, the Processing of Personal Data (Protection of Individuals) Laws 2001 till 2012 remain in force.