VELSTEIN MARKETS

COMPLIANCE • POLICY 08

Privacy Policy

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SECTION 01

Introduction and Scope

1.1 Velstein Markets (hereinafter referred to as "the Company," "we," "us," or "our") is committed to protecting the privacy and personal data of its clients, prospective clients, website visitors, and other individuals who interact with our services.

1.2 This Privacy Policy explains what personal data we collect, how we use it, who we share it with, and what rights you have in relation to your data. It applies to all personal data processed by the Company in connection with the provision of our trading services, website, client portal, and mobile applications.

1.3 This Privacy Policy has been drafted in accordance with applicable data protection laws and regulations, applicable national data protection laws, and relevant financial services regulations. Where local legislation imposes stricter requirements, we comply with such legislation.

1.4 By opening an account, accessing our website, or using any of our services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with the practices described herein, you should not use our services.

SECTION 02

Data Controller

2.1 The data controller responsible for processing your personal data is Velstein Markets, a company incorporated in Saint Lucia with Company Registration Number 2026-00749, whose registered address is Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, St. Lucia.

2.2 The Company is duly registered and incorporated in Saint Lucia under Company Registration Number 2026-00749. As a regulated entity, we are subject to additional data processing obligations imposed by our supervisory authority.

2.3 For any questions regarding data protection or this Privacy Policy, you may contact our Data Protection Officer at dpo@velsteinmarkets.com.

SECTION 03

Data We Collect

3.1 We collect and process the following categories of personal data, depending on the nature of your relationship with us and the services you use:

3.2 Personal Identification Data

- Full legal name, date of birth, nationality, and country of residence
- Government-issued identification documents (passport, national identity card, driver's license)
- Proof of address documentation (utility bills, bank statements, official correspondence)
- Photographs and selfie images for identity verification purposes
- Tax identification number (TIN) and tax residency status

3.3 Financial Data

- Source of funds and source of wealth information
- Employment status, occupation, and annual income range
- Net worth and investment experience declarations
- Bank account details, credit/debit card information, and payment wallet identifiers
- Transaction history including deposits, withdrawals, and internal transfers

3.4 Trading Activity Data

- Trading account numbers, account types, and account balances
- Order history, trade execution records, open and closed positions
- Instrument preferences, leverage settings, and margin utilisation
- Profit and loss records, swap charges, and commission history
- Platform usage data across MetaTrader 5, Web Terminal

3.5 Device and Technical Data

- IP address, browser type and version, operating system, and device identifiers
- Login timestamps, session duration, and access logs
- Geolocation data derived from IP address
- Referring website URLs and pages visited within our website
- Screen resolution, language preferences, and time zone settings

3.6 Cookies and Tracking Data

- Cookie identifiers and session tokens
- Pixel tags, web beacons, and similar tracking technologies
- Advertising identifiers and analytics data from third-party services
- User preferences and consent records

SECTION 04

How We Collect Data

4.1 Data Collected Directly from You

4.1.1 We collect personal data directly from you when you complete our online account opening application, submit identity and address verification documents, fund your trading account, communicate with our support teams, participate in surveys or promotions, or submit any form on our website.

4.2 Data Collected Automatically

4.2.1 When you visit https://velsteinmarkets.com or use our trading platforms, we automatically collect technical data through cookies, server logs, and similar technologies. This includes your IP address, browser type, device information, pages visited, and the date and time of your visits.

4.3 Data Obtained from Third Parties

4.3.1 We may receive personal data about you from the following third-party sources:

- KYC and identity verification providers — electronic identity verification services, document authentication providers, and biometric verification partners
- Credit reference agencies — financial standing and creditworthiness data
- Sanctions screening databases — PEP (Politically Exposed Persons) status and sanctions list checks
- Payment service providers — transaction confirmation data and fraud screening results
- Introducing brokers and affiliates — referral information and lead data where you have been introduced to us by a third party
- Public registers and databases — company registries, tax authority databases, and publicly available information

SECTION 05

Purpose of Processing

5.1 We process your personal data for the following purposes:

Purpose	Description
Account opening and onboarding	To verify your identity, assess your suitability for our products, and establish your trading account
Service provision	To execute your trades, process deposits and withdrawals, maintain your account, and provide access to our trading platforms
Regulatory compliance	To comply with anti-money laundering (AML), know-your-customer (KYC), tax reporting (CRS/FATCA), and other legal obligations
Risk management	To assess and manage counterparty risk, credit risk, and operational risk arising from your trading activity
Communication	To respond to your enquiries, send account notifications, provide market updates, and deliver service-related communications
Marketing	To send promotional materials, newsletters, and educational content where you have provided consent or where we have a legitimate interest
Fraud prevention	To detect, prevent, and investigate fraud, money laundering, terrorist financing, and other financial crimes
Platform improvement	To analyse usage patterns, diagnose technical issues, and improve the performance and functionality of our services
Legal proceedings	To establish, exercise, or defend legal claims and to comply with court orders or regulatory investigations

SECTION 06

Legal Basis for Processing

6.1 Under applicable data protection laws and regulations, we must have a lawful basis for processing your personal data. We rely on the following legal bases, depending on the specific processing activity:

6.2 Performance of a Contract

6.2.1 Processing is necessary for the performance of the Client Agreement between you and the Company, including account opening, trade execution, payment processing, and the provision of customer support. Without such processing, we would be unable to provide our services to you.

6.3 Compliance with Legal Obligations

6.3.1 Processing is necessary to comply with legal and regulatory obligations to which the Company is subject. This includes AML and KYC requirements, tax reporting obligations (including CRS and FATCA), transaction record-keeping requirements, and responding to requests from supervisory authorities, law enforcement agencies, and courts.

6.4 Legitimate Interests

6.4.1 Processing is necessary for the purposes of our legitimate interests, provided that such interests are not overridden by your fundamental rights and freedoms. Our legitimate interests include:

- Fraud detection, prevention, and investigation
- Risk management and assessment of trading activity
- Business analytics, reporting, and improvement of our services
- Network and information security
- Direct marketing to existing clients regarding similar products and services
- Enforcement of our legal rights and contractual terms

6.5 Consent

6.5.1 Where we rely on your consent as the legal basis for processing (for example, for marketing communications to prospective clients or the use of non-essential cookies), you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

SECTION 07

Data Sharing and Disclosure

7.1 We do not sell your personal data to third parties. We may share your personal data with the following categories of recipients where necessary for the purposes set out in this Privacy Policy:

7.2 Payment Processors and Banking Partners

7.2.1 We share transaction data, identification data, and account details with payment service providers, banks, and electronic money institutions in order to process your deposits, withdrawals, and payment instructions. These providers act as independent data controllers or data processors, depending on the nature of the arrangement.

7.3 KYC and Verification Providers

7.3.1 We share identification documents and personal information with third-party identity verification providers, electronic KYC services, and document authentication partners in order to verify your identity and comply with our AML obligations.

7.4 Regulators and Authorities

7.4.1 We may disclose your personal data to financial regulators, supervisory authorities, tax authorities, law enforcement agencies, and courts where we are required to do so by law or regulation, or where it is necessary to protect the Company's legitimate interests.

7.5 Other Third Parties

7.5.1 We may also share your personal data with the following recipients:

- IT service providers — hosting providers, cloud storage services, cybersecurity firms, and software development partners
- Professional advisors — legal counsel, auditors, and accountants acting under obligations of confidentiality
- Liquidity providers — counterparties who facilitate trade execution, who may receive anonymised or pseudonymised trading data
- Introducing brokers and affiliates — where you have been referred to us by a third party, limited data may be shared for commission calculation purposes
- Group companies — entities within the same corporate group as the Company, for internal administrative purposes and consolidated regulatory reporting

7.6 All third parties with whom we share personal data are required to implement appropriate technical and organisational measures to protect your data. Where third parties act as data processors on our behalf, we enter into data processing agreements that comply with applicable data protection requirements.

SECTION 08

International Transfers

8.1 Your personal data may be transferred to, and processed in, countries outside the European Economic Area ("EEA") or outside the jurisdiction in which you reside. Such transfers may be necessary for the performance of our contract with you, for the provision of our services, or for the fulfilment of our legal obligations.

8.2 Where we transfer personal data to a country that has not been deemed to provide an adequate level of data protection, we ensure that appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) or equivalent contractual protections

- Binding Corporate Rules (BCRs) for intra-group transfers
- Transfers to countries or territories that have been granted an adequacy decision by the relevant authority
- Other legally recognised transfer mechanisms under applicable data protection law

8.3 You may request a copy of the applicable safeguards by contacting our Data Protection Officer at dpo@velsteinmarkets.com.

SECTION 09

Data Retention

9.1 We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected, to comply with our legal and regulatory obligations, and to protect our legitimate interests.

9.2 The following retention periods apply as a general guide:

Data Category	Retention Period	Basis
Client identification and KYC records	Minimum 5 years after the end of the business relationship	AML/KYC regulatory requirements
Transaction and trading records	Minimum 5 years after the date of the transaction	Financial services record-keeping obligations
Communication records	Minimum 5 years from the date of the communication	Regulatory requirements and dispute resolution
Marketing consent records	Duration of the consent plus 3 years	Demonstrating lawful basis for processing
Website and platform analytics	Up to 26 months from the date of collection	Legitimate interest in service improvement
Complaint and dispute records	Minimum 7 years from the resolution of the complaint	Legal obligation and defence of claims

9.3 Where longer retention periods are required by applicable law or regulation, or where data is necessary for the establishment, exercise, or defence of legal claims, we may retain your data beyond the standard periods indicated above.

9.4 Upon expiry of the applicable retention period, your personal data will be securely deleted or anonymised so that it can no longer be associated with you.

SECTION 10

Your Rights

10.1 Subject to applicable law and certain exemptions, you have the following rights in relation to your personal data:

10.2 Right of Access

10.2.1 You have the right to request confirmation of whether we process your personal data and, if so, to obtain a copy of that data together with information about the purposes of processing, categories of data, recipients, retention periods, and your rights.

10.3 Right to Rectification

10.3.1 You have the right to request the correction of inaccurate personal data and the completion of incomplete personal data. You may update certain information directly through your client portal or by contacting us at support@velsteinmarkets.com.

10.4 Right to Erasure

10.4.1 You have the right to request the deletion of your personal data where it is no longer necessary for the purpose for which it was collected, where you have withdrawn consent, or where there is no overriding legitimate ground for processing. Please note that we may be unable to comply with erasure requests where retention is required by law or for the establishment, exercise, or defence of legal claims.

10.5 Right to Data Portability

10.5.1 You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller where the processing is based on consent or contract and is carried out by automated means.

10.6 Right to Restrict Processing

10.6.1 You have the right to request that we restrict the processing of your personal data where you contest the accuracy of the data, where the processing is unlawful, where we no longer need the data but you require it for legal claims, or where you have objected to processing pending verification of our legitimate grounds.

10.7 Right to Object

10.7.1 You have the right to object to the processing of your personal data where we rely on legitimate interests as the legal basis, including profiling based on legitimate interests. You also have the right to object at any time to the processing of your personal data for direct marketing purposes.

10.8 Right to Withdraw Consent

10.8.1 Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

10.9 Right to Lodge a Complaint

10.9.1 You have the right to lodge a complaint with the relevant data protection authority in Saint Lucia or in your country of residence if you consider that our processing of your personal data infringes applicable data protection laws.

HOW TO EXERCISE YOUR RIGHTS

To exercise any of the above rights, please submit a written request to our Data Protection Officer at dpo@velsteinmarkets.com. We will respond to your request within 30 days. In exceptional circumstances, this period may be extended by a further 60 days, in which case we will notify you of the extension and the reasons for it.

SECTION 11

Cookies Policy

11.1 Our website (https://velsteinmarkets.com) uses cookies and similar tracking technologies to enhance your browsing experience, analyse website traffic, and deliver personalised content.

11.2 A cookie is a small text file that is placed on your device when you visit a website. Cookies enable the website to remember your actions and preferences over a period of time.

11.3 We use the following categories of cookies:

Cookie Type	Purpose	Duration
Strictly Necessary	Essential for the operation of the website, including session management, security, and authentication	Session / up to 24 hours
Functional	Remember your preferences such as language, region, and display settings	Up to 12 months
Analytics / Performance	Collect anonymised data about how visitors use the website to help us improve its functionality and content	Up to 26 months

Cookie Type	Purpose	Duration
Marketing / Advertising	Track your activity across websites to deliver targeted advertising and measure campaign effectiveness	Up to 13 months

11.4 Strictly necessary cookies are placed without your consent as they are essential for the website to function. For all other categories, we request your consent through our cookie consent banner. You may change your cookie preferences at any time through the cookie settings link on our website.

11.5 You may also configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, disabling cookies may affect the functionality of our website and your ability to access certain features.

SECTION 12

Security Measures

12.1 We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures are designed in accordance with industry best practices and applicable regulatory requirements, and include:

- Encryption: All data transmitted between your browser and our servers is encrypted using TLS (Transport Layer Security). Sensitive data at rest is encrypted using AES-256 encryption or equivalent standards.
- Access controls: Access to personal data is restricted to authorised personnel on a need-to-know basis. Multi-factor authentication is enforced for system administrators and employees with access to client data.
- Network security: Firewalls, intrusion detection systems, and continuous monitoring are deployed to protect our infrastructure against cyber threats.
- Regular audits: We conduct periodic security assessments, penetration testing, and vulnerability scans to identify and remediate potential weaknesses.
- Employee training: All employees and contractors receive regular data protection and information security training.
- Incident response: We maintain a documented incident response plan to ensure that any personal data breach is detected, reported, and managed in accordance with applicable requirements, including notification to the relevant authority where required.

12.2 While we take all reasonable precautions, no method of transmission over the internet or method of electronic storage is completely secure. We cannot guarantee the absolute security of your data.

SECTION 13

Changes to This Policy

13.1 We reserve the right to update or amend this Privacy Policy at any time to reflect changes in our data processing practices, legal or regulatory requirements, or business operations.

13.2 Where we make material changes to this Privacy Policy, we will notify you by publishing the updated policy on our website and, where appropriate, by sending a notification to the email address associated with your trading account. The revised policy will indicate the date on which it was last updated.

13.3 Your continued use of our services after the publication of an updated Privacy Policy constitutes your acceptance of the revised terms. If you do not agree with the changes, you should cease using our services and contact us to discuss the closure of your account.

SECTION 14

Contact the Data Protection Officer

14.1 If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, please contact our Data Protection Officer using the details below:

Data Protection Officer	Velstein Markets — DPO
Email	dpo@velsteinmarkets.com
Postal Address	Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, St. Lucia.
Website	www.velsteinmarkets.com

14.2 We will endeavour to respond to all data protection enquiries within 30 days of receipt. If you are not satisfied with our response, you have the right to lodge a complaint with the competent data protection supervisory authority in your jurisdiction.

Document	Privacy Policy
Company	Velstein Markets LTD
Effective Date	October 08, 2026
Website	www.velsteinmarkets.com
DPO Contact	dpo@velsteinmarkets.com

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