

VALUE BRIDGE SINGLE MEMBER INVESTMENT SERVICES S.A - Privacy Policy

VALUE BRIDGE SINGLE MEMBER INVESTMENT SERVICES S.A (“we”, “us”) is the owner of the market10.com and is regulated and licensed under the Hellenic Capital Market Commission (“HCMC”) to provide investment and ancillary services. For more information about us and how to contact us, please see section 6 of this notice.

This notice is to inform our clients or prospective clients, how we use the personal information we collect about them in the course of providing services and their rights in relation to the processing of their personal information.

1. HOW DO WE COLLECT INFORMATION ABOUT YOU?

We collect your personal information from various sources, including:

- Directly from you, when you create a market10.com account, when you request any of our services, or request to receive marketing, or when you communicate with us; We also collect information generated by you when you use our services, such as your transaction information.
- Using automated technologies. When you use or access our website and services, we may collect technical data about your equipment, browsing actions and patterns and information about the way you use our services. We collect this data by using cookies; For those cookies that are not strictly necessary for the provision of our services, we will seek your consent at the time of your initial visit to our website. For more information and options regarding our use of cookies please see [here](#).
- From third party service providers, such as credit reference agencies, fraud prevention agencies, identity verification vendors, banks, and payment services providers, authentication service providers, marketing and analytics providers and from publicly available sources such as public registers.

2. WHAT INFORMATION WE COLLECT FROM YOU AND WHY

We may collect, store, and use the following information about our clients and perspective clients:

- Identity information - your full name, proof of identity, including passport copies and proof of address, date and place of birth, your age, photo, occupation and country of residence. This information is necessary in order to register you as a client, to provide you with our services and to carry out our obligations arising from any contracts between us. It is also necessary in order to verify you are eligible to receive our services and to comply with our legal and regulatory obligations.

- Contact details – your name, email address, phone number. This information is necessary to provide you with our services, to perform our contract or to manage our relationship, including to respond to any enquires and resolve any complaints and to comply with our legal and regulatory obligations. We may also use your contact details to provide you with marketing information about our products where you have provided your consent.
- Professional qualifications - level of education, profession, experience in trading, knowledge of the industry and of risks associated with trading. We process this information in order to ensure that you qualify to receive services from us based on applicable laws and regulations.
- Appropriateness Tests and profiling information - In order to perform the contract between us and in order to comply with applicable legislation, before we can provide you with our services and periodically thereafter, we must assess your knowledge and experience, your financial situation and investment objectives and your risk profile. We do this through the use of Appropriateness Tests. In particular, when you apply to register as a client you must undertake a test to establish whether it is suitable for us to provide you with our services and products. The test concerns your knowledge, financial background and experience in financial services. Based on the scoring you receive, and the answers you provide in the test, you are evaluated by automated means in respect of your eligibility to receive our services. We will then inform you accordingly. The reason for assessing your appropriateness is to enable us to offer to you services suitable to you, to act in your best interest and to comply with applicable legislation.
- Criminal convictions- we may collect this information as part of our Know Your Client (KYC) obligations in order to determine whether to onboard and maintain you as a client and in order to fulfil our legal obligations. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.
- Financial information – annual income, net worth, source of funds, anticipated account turnover, bank account details and statements, payment card details, e-wallet information, financial transactions performed through our services etc. We process this information in order to register you as a client, to provide you with our services and to carry out our obligations arising from any contracts between us. Also, to fulfil our legal or regulatory requirements (including in relation to anti-money laundering) and other regulatory obligations -such as appropriate client due diligence-, and to manage payments, fees and charges, to pay, collect and recover any money.
- Transaction data – details about products and services you have purchased from us, details of your transactions, including financial transactions through our services. We

process this information in order to perform our contract and administer our relationship and to comply with legal and regulatory obligations. We may analyze this data based on our legitimate interests, in order to provide you with relevant information about our services and products, training materials and other information or marketing materials.

- Profile and usage data – your username and password, purchases, your interests, preferences and feedback. This information is necessary in order to perform our contract with you and to comply with our legal obligations. We may analyze those data based on our legitimate interests or in case you are a perspective client, on your consent, in order to provide you with marketing materials.
- Communication data – we process the contents of your communications with us, such as contents of e-mail correspondence, chats or the “contact us” form on our site. We also record our telephone communications. We do this because we are required by law, but also in order to perform our contract and to administer our relationship.
- Technical information – we collect certain technical information when you use our services, such as your IP address, MAC address, device approximate location, your login data, plugins your login credentials, UDID, Google advertising ID, IDFA, cookie identifiers, and other identifiers such your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This information is necessary in order to perform our contract, to comply with legal obligations and we may also analyze this data based on our legitimate interests or on your consent, in order to provide you with marketing materials.
- Marketing Data, Analytics and Data from Tracking Technologies – When you visit or access our services, we use and authorize third parties who provide services to us to use pixels, cookies, events and other technologies (“*Tracking Technologies*”). These 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 merge information we have with information collected through these tracking technologies and with information we may obtain from other sources in order to profile your interests in our products/services for marketing purposes. We base this processing on your consent. For more information and options regarding our use of these technologies please see [here](#).

We also process all of the above categories of information based on our legitimate interests, in order to prevent fraud or protect your, our, or others’ rights or when we believe it’s necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect our rights and property, that of our clients and/or partners.

3. WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

- Internal concerned parties - we share your information with companies in our group, as well as our employees. We limit access to those employees or partners who need to know the information in order to provide you with our services.
- Financial providers and payment processors - we share financial information about you for purposes of accepting deposits or performing risk analysis.
- Business partners - we may share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- Regulatory supervisors and our legal and other consultants - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our [Terms or Client Agreement](#), take precautions against 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 VALUE BRIDGE SINGLE MEMBER INVESTMENT SERVICES S.A, its users and/or partners. We may also disclose your personal information where requested by our supervisor (the Hellenic Capital Market Commission), 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.
- Mergers and acquisitions – we may share your information in case we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets.

Transfer of data outside the EEA - Some data recipients may be located outside the EEA. In such cases we will transfer your data 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 in accordance with the latest guidelines and opinions issued by the EDPB (European Data Protection Board).

4. HOW WE PROTECT YOUR INFORMATION AND FOR HOW LONG WE KEEP IT

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. Your information is stored on secure servers and isn't publicly available. We limit access 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.

We will retain your personal information for as long as necessary to provide our services, to comply with our legal obligations and resolve disputes. Retention periods will be determined by legal requirements, by the type of information that is collected and the purpose for which it is collected, bearing in mind the applicable requirements to the situation and the need to destroy outdated and unused information at the earliest reasonable time. Under applicable regulations, we are obliged to keep records containing

client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations for five years from the account closing date.

5. YOUR RIGHTS

You have the right to:

- **Request a copy of** your information, together with information about how this is processed.
- **Request correction** of the information that we hold about you. Please inform us if your personal data changes during your relationship with us.
- **Request erasure** of your information where there is no good reason for us continuing to process it or where you have exercised your right to object to processing.
- **Object to processing** of your information where we are relying on our legitimate interest for example where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy.
- **Request the transfer** of your information to another party in a structured, commonly used and machine-readable format where we process this information on the basis of your consent or to perform our contract and we carry out the processing by automated means.

Marketing and opting out - We will occasionally send you marketing information where you have provided your consent for us to do so and we may build a profile of your interests for marketing purposes. You are free to withdraw your consent at any time by opting out by using the “unsubscribe” link at the bottom of each marketing e-mail, by contacting our Data Protection Officer (“DPO”) or by changing your marketing preferences in your account settings. Please note that even if you unsubscribe from marketing material, we may continue to send you service-related updates and notifications, or reply to your queries.

6. UNSOLICITED ADVERTISING

The company shall not initiate contact with any individual that has not explicitly accepted the company’s Terms and Conditions. This includes, but is not limited to, unsolicited advertising through communications via email, phone, text message, social media, or other digital or physical channels. The company recognizes and respects the right of individuals to privacy and strictly adheres to all applicable anti-spam laws and regulations, including the prohibition of unsolicited commercial messages.

All communications must clearly disclose the Company’s identity. The Company shall apply a strict anti-spam policy and shall never use spam email techniques in marketing material.

7. HOW TO CONTACT US AND HOW TO MAKE A REQUEST

If you wish to exercise any of the above rights, file a request or receive more information, please do it so through our website by using our [GDPR section](#) or by contacting our DPO directly, using the details provided below:

Email: gdpr@valuebridge.gr

Attn. DPO

VALUE BRIDGE SINGLE MEMBER INVESTMENT SERVICES S.A, registration number 161690660000

43 Aiolou str., 3rd floor, 10551, Athens, Greece

You also have the right to file a complaint with the relevant Data Protection Authority.