



## Privacy Policy

This privacy policy (the "Policy") explains how Aries Financial, LLC. ("Aries Financial", "we" or "us" ) collects, uses and discloses personal information through its websites, mobile applications, and other online products and services that link to this Policy (collectively, the "Services") or when you otherwise interact with us.

We encourage you to read the Policy carefully as it forms part of the relevant and conditions, service agreements, as the case may be.

### Application of this Policy

For the purposes of applicable international data protection laws, Aries Financial is the "controller" of personal information collected through Aries Financial' websites, mobile applications and other platforms (together the "Site"), and is the company to contact if you have questions about the use of your personal information.

### Accuracy

It is important that the data we hold about you is accurate and current, therefore please keep us informed of any changes to your personal data.

### What data do we process?

Inventory data (e.g., names, addresses).  
Contact details (e.g., e-mail, telephone numbers).  
Contract data (e.g., object of contract, duration, customer category).  
Payment data (e.g., bank details, payment history).  
Usage data (e.g., websites visited, interest in content, access times).  
Meta/communication data (e.g., device information, IP addresses).

### Children Data

Our Services are not intended for children and we do not knowingly collect data relating to children. If you become aware that your Child has provided us with Personal Data, without parental consent, please contact us and we take the necessary steps to remove that information from our server.

### What are the categories of data subjects?

Customers, interested parties, visitors and users of the Services, business partners. Visitors and users of the online offer. In the following, we refer to the data subjects collectively as "users".

### What are the purposes for processing?

- Provision of the Services, its contents and functions.
- Provision of contractual services, customer service and care.
- Answering contact enquiries and communication with users.
- Marketing, advertising and market research.
- Security measures.

### What are the relevant legal bases for processing your data?

Unless the legal basis is not specifically mentioned, the following applies:

**Consent** – This is where we have asked you to provide explicit permission to process your data for a particular purpose.

**Contract** – This is where we process your information to fulfil a contractual arrangement we have made with you.



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**Answering your business enquiries** – This is where we process your information to reply to your messages, e-mails, posts, calls, etc.

**Legitimate Interests** - This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way. Of course, before relying on any of those legitimate interests we balance them against your interests and make sure they are compelling enough and will not cause any unwarranted harm.

**Legal Obligation** – This is where we have a statutory or other legal obligation to process the information, such as for the investigation of crime.

**Vital interests** – This is where we process your information for communications about security, privacy and performance improvements of our services. Or for establishing, exercising or defending our legal rights.

### Your Rights

You are entitled at any moment to enforce the rights available to you under applicable Data Protection Laws, including but not limited to the right of access, rectification, restriction, erasure, opposition (including objecting, at any time and for free, to the processing of your personal data for direct marketing purposes), right to portability as well as the right to withdraw your consent. You also have the right to lodge a complaint with the competent supervisory authority. In more detail the following briefly summarizes your rights.

### GDPR Specific Rights

As an individual whose personal data is processed as described in this Privacy Policy, you have a number of rights which are summarized below. Please note that exercising these rights is subject to certain requirements and conditions as set forth in applicable law.

#### Right of access

Subject to applicable law, you have the right to obtain confirmation from us as to whether or not personal data that concerns you is processed, and, if so, to request access to such personal data including, without limitation, the categories of personal data concerned, the purposes of the processing and the recipients or categories of recipients. However, we do have to take into account the rights and freedoms of others, so this is not an absolute right. If you request more than one copy of the personal data undergoing processing, we may charge a reasonable fee based on administrative costs.

#### Right to rectification

You have the right to request from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you also have the right to request that incomplete personal data be completed, including by means of providing a supplementary statement.

#### Right to erasure ('right to be forgotten')

You have the right to request from us the erasure of personal data concerning you in certain circumstances as defined under applicable law. When your request falls within one of those circumstances, we will erase your personal data without undue delay. If, for technical and organisational reasons, we were not able to erase your personal data, we will ensure that it is fully and irreversibly anonymized so that we will no longer be holding such personal data about you.

#### Right to restriction of processing

In certain circumstances as defined under applicable law, you have the right to request the



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restriction of processing of your personal data. In such a case, your personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

### **Right to data portability**

In certain circumstances as defined under applicable law, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another controller or to have such personal data transmitted directly from us to another controller, where technically feasible.

### **Right to object**

In certain circumstances as defined under applicable law, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. This notably applies in case of processing of your personal data based on our legitimate interests or for statistical purposes.

### **Right to object to direct marketing**

Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing for such direct marketing (including profiling related to such direct marketing).

### **Right not to be subject to a decision based solely on automated processing,**

Subject to certain restrictions, you have the right not to be subject to a decision based solely on automated processes, including profiling, which produces legal effects on you similarly significantly affects you.

### **Right to withdraw consent**

If you have declared your consent for any personal data processing activities as described in this Privacy Policy, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to withdrawal of the consent.

If you wish to access such personal data or exercise any of the rights listed above, you should apply in writing, providing evidence of your identity to us.

Any communication from us in relation to your rights as detailed above will be provided free of charge. However, in case of requests that are manifestly unfounded or excessive, in particular because of their repetitive character, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

### **California Specific Rights**

If you are a California resident, you have the following rights:

You have the right to:

- request, up to two times each year, access to categories and specific pieces of personal information about you that we collect, use, disclose, and sell;
- request that we delete personal information that we collect from you, subject to



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applicable legal exceptions;

- “opt out” of the “sale” of your “personal information” to “third parties”;

In addition, under California’s “Shine the Light” law, California residents who provide personal information (as defined in the statute) to obtain services are entitled to request and obtain from us, once per calendar year, information about the personal information we shared, if any, with other businesses for marketing purposes. If applicable, this information would include the categories of personal information and the names and addresses of those businesses with which we shared such personal information for the immediate prior calendar year (e.g., requests made in the current year will receive information about the prior year). To obtain the information about data we hold about you or to effect the opt out, please contact us.

### **Do Not Track**

Do Not Track is a privacy preference you can set in most browsers. We support Do Not Track because we believe that you should have genuine control over how your info gets used and our site responds to Do Not Track requests.

### **Do Not Sell My Personal Information**

We do not sell information that directly identifies you, like your name, address, banking information, or phone records. In fact, we do not even share that type of information except with service providers who can use the information solely to provide a service on our behalf, when a consumer directs us to share the information. If applicable, you can choose whether you want this sharing or not. Remember, we don’t sell data that directly identifies you unless we have your explicit permission, no matter what choice you make. To make your choices, please contact us.

### **Collection of Information**

#### **Information You Provide to Us**

We collect information you provide directly to us. For example, we collect information when you create an account, participate in any interactive features of the Services, fill out a form, communicate with us via third party social media sites, request customer support, or otherwise communicate with us.

#### **When You Sign Up or Register for an Account or Services**

If you sign up for an account or Services, we will collect basic information about you including your name, email address and telephone number. You may provide this information to us directly.

- We will use the information that we collect about you to:
- Create and maintain your account;
- Allow you to log in;
- Contact you about your account and/or the services;

#### **When You Provide Information to Build Your Profile**

Once you have created an account, we will ask you to provide additional optional information about yourself to complete your “Profile”.

The information we ask for may include your gender, date of birth, place of birth, addresses, nationality, national insurance number (or other government- issued identification number), citizenship and residency status, Tax ID, and information about your experience trading, education, source of income, investment aims and appetite, occupation, employer and employment position, annual income, investment portfolio, total cash and liquid assets and other details or questions as may be required in the Profile creation and the process may be amended



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by us from time to time.

We will also ask you to provide a copy of an identification document, such as a passport, residency, visa or national identity card, a utility bill and such other documents as may be required by us in order to comply with our regulatory obligations and to verify your identity. We will use the information you provide in your Profile to:

- verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, “know your customer”, anti-money laundering, fraud, sanctions and politically exposed person checks;
- contact you on matters related to your account, including, to request any additional information or documentation;
- provide you with notices related to your account, general updates, and other marketing materials,
- tailor the products and services offered through the Site to you,
- assess your risk score according;
- maintain administrative records relating to our business;
- set up security measures to secure your account,

You can update your Profile at any time by visiting the “Account” page in the Settings menu. We recommend that you update your Profile regularly, to ensure that the functions offered to you are appropriate for your current circumstances. You further agree to update such information upon request, if we consider the information provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our Services to your profile. You do not have to provide the information to complete your Profile, however if you choose not to, we may be unable to offer full functionalities to you.

### **When you Contact Us**

If you contact us by telephone, email, post or use another function offered by us, we will collect any information about the communication and any additional information that you choose to give us. We will use this information to review, investigate and respond to any comment or question that you may raise. Please note that we record and retain all telephone calls and other communication with us and may use it in our dealings with you including any dispute resolution or legal proceedings.

### **Unsolicited Information**

If you provide us with personal information that we have not requested then we will endeavour to only retain the information that we are otherwise entitled to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

### **Use of Information**

We use the information we collect to provide, maintain, and improve our services, such as to administer and verify your account, to provide the services you request and customize your experience with us. We also use the information we collect to:

- carry out our obligations owed to you;
- comply with our regulatory and other legal obligations;



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- monitor any content, you post;
- administer transactions including deposits, chargebacks and payments;
- monitor account activity, including by detecting inconsistencies in payments and looking out for potentially illegal activities;
- determine whether a payment method is being abused;
- compile statistical analysis of the pages of our platform and websites;
- monitor and analyse our business;
- investigate and to manage enquiries, disputes and legal proceedings and to comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;
- participate in crime prevention, legal and regulatory compliance and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement, even if not compelled to do so;
- develop and to market other products and services;

### Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, the data processed by us will be deleted or restricted in their processing. If the data is not deleted because they are required for other and legally permissible purposes, their processing is restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

### When do we disclose your Personal Data?

We may share your information with organisations that help us provide the services described in this policy and who may process such data on our behalf and in accordance with this policy, to support this website and our services. This will only be done on the basis of a legal authorisation (e.g. if a transfer of the data to third parties, such as payment service providers).

Also, if you have consented to it, or where there we have a legal obligation to do so or on the basis of our legitimate interests (e.g. when using agents, hosting providers, tax, business and legal advisors, customer care, accounting, billing and similar services that allow us to perform our contractual obligations, administrative tasks and duties efficiently and effectively). If we commission third parties to process data on the basis of a so-called "contract processing agreement".

We may also disclose information in other circumstances such as when you agree to it or if the law, a Court order, a legal obligation or regulatory authority ask us to. If the purpose is the prevention of fraud or crime or if it is necessary to protect and defend our right, property or personal safety of our staff, the website and its users.

### Integration Of Services And Contents Of Third Parties

We use within our online offer on the basis of our legitimate interests, content or services offered by third-party providers in order to integrate their content and services.

This always requires that the third-party providers of this content are aware of your IP address, since the content or service could not send to your browser without the IP address. The IP address is thus required for the display of this content and we endeavor to use providers that only use your IP address for the delivery of the content or services. However, Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for



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statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer, as well as be linked to such information from other sources.

### **Advertising and Analytics Services Provided by Others**

We may allow others to provide analytics services and serve advertisements about our products services on our behalf across the web and in mobile applications. This may involve cookies and other technologies to collect information about your use of the Services. This information may be used by us to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services, and better understand your online activity in connection with the Services. For more information about interest-based ads generally, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) if you are in the United States and if you are in the EU, please visit [www.youronlinechoices.eu/](http://www.youronlinechoices.eu/)

### **Third country transfer / intention to transfer data to third countries**

Data is only transferred to third countries (outside the USA) if this is necessary for the performance of the contractual relationship, is required by law or you have given us your consent.

### **Secure transmission of your data**

In order to protect the data stored with us in the best possible way against accidental or intentional manipulation, loss, destruction or access by unauthorised persons, we use appropriate technical and organisational security measures. The security levels are continuously reviewed in cooperation with security experts and adapted to new security standards.

The exchange of data to and from our website is always encrypted. We offer HTTPS as the transmission protocol for our website, in each case using the current encryption protocols.

### **Promotional Communications**

You may opt out of receiving promotional emails or text messages from us by following the instructions in those emails or text messages or by visiting the "Notifications" tab in the "Settings" menu on our platform. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

### **Mobile Push Notifications/Alerts**

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

### **Transfer of Information to Other Countries**

When using our services, your data is processed and stored in the USA and other countries. We and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process.

### **Remarketing and Behavioural Targeting**



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These types of services allow us to analyse how various Aries services have been used in a user's previous sessions in order to target, optimise and deploy advertising.

This activity is facilitated by tracking usage data and the use of trackers that collect information which is then transmitted to the partners who manage the remarketing and behavioural targeting activities. Some services offer a remarketing option based on email address lists.

In addition to any opt-out options offered by each of the services listed below, users may opt-out via the Network Advertising Initiative opt-out page. Users may also opt-out of certain advertising features through appropriate device settings, such as device advertising settings for mobile phones or advertising settings in general.

### **Data security**

We take appropriate technical and organisational measures, taking into account the state of the art, the costs of implementation and the nature, scope, circumstances and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

### **Changes**

This Policy and our commitment to protecting the privacy of your personal data can result in changes to this Policy. Please regularly review this Policy to keep up to date with any changes.

### **Queries and Complaints**

Any comments or queries on this policy should be directed to us.