

Privacy Policy

1. Introduction

Pluto.markets Fondsmæglerselskab A/S (hereafter "**the Company**") has established this privacy policy. We take the protection of your personal data seriously, and this policy reflects that commitment. As a regulated financial institution under the Danish Financial Supervisory Authority (hereafter "**the DFSA**"), we are committed to responsibly handling the personal information of those we engage with in a way that meets the legal requirements of the countries in which we operate. This policy should be read together with our Terms and Conditions and our Third Party Agreement.

If you have any questions about how we protect or use your data, please email us at support@pluto.markets. This Privacy Policy is an overview of how we collect, use, and process your personal data when you use our services.

2. Collection of Personal Data

The Company processes the personal data you provide in connection with expressing interest, applying, and/or entering into an agreement with the Company and our third parties. We process other information related to the administration of your agreement and have the right to document and log the interactions and communications you have with us.

Personal Information: Data that can identify you, such as your name, date of birth, personal identification number, email address, phone number, or similar.

Customer Information: Data linked to your account with the Company, such as unique identifiers, account numbers, residency and tax residency, transactions, as well as the history associated with your account.

Suitability Assessment: Information you provide during the suitability assessment as part of onboarding (and subsequently evaluated and updated continuously throughout the customer relationship), such as the purpose of your savings, source of funds, associations, your investment horizon, and similar.

Appropriateness Assessment: Information you provide during the appropriateness assessment, such as your knowledge of financial instruments.

Tax Obligation: Data about tax obligations in another country, such as citizenship and the country where you are tax liable.

Anti-Money Laundering and Terrorism Financing: Information necessary to mitigate the risk of money laundering and terrorism financing, such as details about your primary occupation, the purpose of your engagement with the Company, and the source of the funds and/or securities you deposit in your account.

Interaction with the Company: Data about how you use our services, including how you access and interact with our platforms, any download errors, and page response times.

Device Information: Data about the device used to log into your account, such as IP address, language settings, browser settings, time zone, operating system, platform, and screen resolution.

3. Processing of Personal Data

The collection and processing of personal data are necessary for the Company to fulfill its obligations. All data is processed in accordance with applicable laws. Only trusted employees have access to customers' personal data. Information about any legal violations will be processed as necessary for reporting to relevant authorities under the Anti-Money Laundering Act.

4. Disclosure of Personal Data

As part of our data processing activities, we may disclose personal data to various recipients, such as other companies within our group, authorities, and companies and suppliers we collaborate with. We implement appropriate legal, technical, and

organizational measures to ensure the secure handling of personal data. Before sharing your personal information, we ensure compliance with confidentiality requirements applicable in the financial sector as stipulated in relevant local and EU-wide law.

5. Legal Basis for Using Your Data

To use the information as provided in sections 2-4, we rely on the following:

- **Consent (GDPR Article 6 (1)(a)):** We can process your data based on your consent. For example, we may send you marketing materials based on your consent.
- **Performance of a Contract (GDPR Article 6 (1)(b)):** We may process your data to perform our obligations pursuant to the Agreement to provide the Services to you.
- **Legal Obligations (GDPR Article 6 (1)(c)):** We may process your data if it is necessary to meet legal obligations we are subject to, such as during our anti-money laundering activities.
- **Legitimate Interest (GDPR Article 6 (1)(f)):** We may process your data if we have a legitimate interest to do so, such as for business development or fraud investigations.

6. Storage of Personal Data

We store personal data as long as there is a legitimate need, i.e., as long as you use our platform. If you no longer use our platform, your information will be deleted after a maximum of 5 years. We only retain personal data as long as necessary to meet customer needs and/or comply with relevant laws, including the Bookkeeping Act and the Anti-Money Laundering Act.

7. Security

The Company has established an IT security policy to protect your information from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, and access. We use various technical and organizational measures to ensure that your data is safe with us.

8. Customer Rights

Under the Data Protection Act and the General Data Protection Regulation, you have several rights regarding the personal data we process. These include:

- The right to access the personal data we process.
- The right to correct and update your registered personal data.
- The right to delete personal data if we no longer have a legitimate need to process it.
- The right to object to the processing of personal data for marketing purposes.
- The right to withdraw your consent.

Requests regarding personal data should be made in writing via email to: support@pluto.markets

9. Sharing Data

We aim to share as little personal data as possible with service providers, especially those outside the EEA region. Whenever possible, we anonymize the shared data so that you cannot be identified based on that data. In some cases, we may transfer your personal data to countries outside the EEA area if it is necessary for the purposes as provided in this Policy and the Terms and Conditions and Third Party Agreements. In such cases, we ensure that adequate safeguards are in place to protect your rights. You may request a copy of such safeguards by contacting us via email.

We may also share your personal data if we are legally required to do so, for example, in cases where the DFSA or a regulator under which a third party is regulated, financial intelligence unit, tax authority, or other relevant authority requests personal data from us. We also share your personal data with other Pluto.markets group entities, which may also reside outside the EEA region. Each Pluto.markets group entity functions under the same internal data processing principles to ensure sound safeguarding of personal data within our group.

10. Complaints

If you have any concerns about our use of your personal data, you can make a query or a complaint to us at support@pluto.markets and we will do our best to address the issue. If you feel that we have not addressed your questions or concerns adequately, or you believe that your data protection or privacy rights have been infringed, you can complain to the Danish Data Protection Agency. The contact details are:

Email: dt@datatilsynet.dk

Phone: +45 33 19 32 00

Website: www.datatilsynet.dk