

## Privacy and Cookie Policy

Maimon Wealth Management Ltd (or "we", "us", "MaimonWealth") is proud in maintaining strong and professional relationships with our clients and general public. Hence, we place strong emphasis in respecting and supporting each person's right to privacy.

This Privacy Policy ("Policy") applies to personally identifiable information that we collect and process through our website at [www.maimonwealth.com](http://www.maimonwealth.com) as well as any other related sites and applications. This Policy does not apply to websites operated by other organizations and other third parties. The Policy also applies to personal information that we collect and process when you use or interact with our services through any correspondence made with us by e-mail, phone or otherwise. The Policy aims to inform you about the type of information we gather, who we share it with, what we use it for, how we keep it secure and what your data privacy rights are.

When using any of our Services you consent to the collection, transfer, storage, disclosure, and use of your personal information subject to this Privacy Policy.

What personal information does MaimonWealth process and why?

When you apply or maintain a trading account with MaimonWealth, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you and providing customer service.

Except as expressly set forth herein, we will not share your Personal Information with third parties without your explicit permission, except when required by law, regulation, subpoena or court order.

We may share Personal Information with our affiliated entities or transfer our database containing your Personal information to any of our affiliates or any other entity owning or acquiring all or substantially all the assets and business of MaimonWealth whether by operation of law or otherwise.

Personal information submitted to us via the Website will be used for the purposes specified in this Privacy Policy. We may use your Personal Information to: (a) Administer the Website and process your activities in connection with the Website; (b) Enable your use of the Website; (c) Communicate with you, send you emails; (d) Help diagnose problems with our servers. We may also share your Personal Information with third party vendors or service providers, such as email service providers sending emails on our behalf. We may also authorize third party vendors or service providers to collect information on our behalf. We may use the Personal Information that you provided us to send you emails about services that we think might interest you. We will not send you such promotional messages if you opt-out from receiving them, or at any time request in writing to stop receiving such messages. In addition, by analyzing all information we receive, including all information concerning Users, we may compile statistical information across a variety of Users ("Statistical Information"). Statistical Information helps understand trends and customer needs so that new products and services can be considered and so existing products and services can be tailored to customer desires. Statistical Information is anonymous and we will not link Statistical Information to any Personal Information. We may share such Statistical Information with third parties, without restriction, on commercial terms that we can determine in our sole discretion and without compensation to you. We use tools including, without limitation, Google

Analytics to collect information about your use of the Services. Google Analytics collects information such as how often users visit the Website, what pages they visit when they do so, and what other sites they used prior to coming to the Website. Google Analytics collects only the IP address assigned to you on the date you visit the Website, rather than your name or other identifying information. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Use located at <http://www.google.com/analytics/terms/us.html> and the Google Privacy Policy located at [http://www.google.com/policies/privacy/partners/..](http://www.google.com/policies/privacy/partners/)

We will use the information you provide us to:

- verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, “know your client”, and anti-money laundering;
- contact you on matters related to your account, including without limitation, to request any additional information and/or documentation;
- tailor the products and services offered to you
- assess whether you qualify as a client;
- maintain administrative records relating to our business according to all applicable laws;
- provide you with notices related to your account, general updates, market updates and other marketing materials, including without limitation, the services and products offered by us and our affiliates
- conduct other legitimate or lawful matters

#### Sharing personal information with external parties

Third party disclosures may include sharing such information with our group companies, affiliates or non-affiliated companies that perform data processing and support services for your account or facilitate your transactions with MaimonWealth, including those that provide professional, legal, technological, processing payments or accounting services to MaimonWealth. Third parties are required to maintain the confidentiality of such information and to use your personal information for the purposes that MaimonWealth dictates and within the ambit of the applicable law. Also, we may share personal information with any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

#### Our legal basis for using your personal information

Entering into and performing the contract with you: If you have a MaimonWealth account or have registered to the Site or service, our legal basis for processing your personal information is that it is necessary for the performance of the relevant MaimonWealth terms and conditions, terms of business and/or terms of use, as the case may be, and to provide a service to you. With respect to MaimonWealth account, this includes facilitating access to our platform, processing payments and executing trades.

## California

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year.

To request a copy of the information disclosure provided by MaimonWealth pursuant to Section 1798.83 of the California Civil Code, please contact [privacy@maimonwealth.com](mailto:privacy@maimonwealth.com).

For other justifiable grounds, including legal obligation and legitimate interests:

We process your personal information where necessary for MaimonWealth in order to comply with legal and regulatory obligations we are under, and also where it is necessary for legitimate interests, we have in conducting our business. These include without limitation:

- Learning about your interests and preferences to contact you with information that is relevant to you and helping us maintain promotional communications with you.
- Analyzing and continually improving the Site and our services and helping us pilot test versions of the Site internally to develop new features and ensure the efficient running of MaimonWealth services.
- Detecting and reducing risk.

## Your rights

Individuals whose personal information we process may be entitled according to their place of residence in EU and other regions:

- to review their personal information,
- to request that it be erased, and we will comply, unless there is a lawful reason for not doing so
- that its processing be restricted,
- or that any inaccurate personal information is corrected.
- have the right to object to the processing of your personal information,
- or in some circumstances to obtain a copy of the personal information in machine readable format,
- right to opt-out of marketing communications, you can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- have the right to object to have your personal information being disclosed to our affiliates or other third parties as described in this Policy.

Any such request should be submitted in writing to [privacy@maimonwealth.com](mailto:privacy@maimonwealth.com). Individuals also have the right to complain about the use of their personal information to the Supervisory Authority which in Cyprus is the Office of the Commissioner for Personal Data Protection.

## Use of Cookies:

Cookies are tiny pieces of data that are sent to your computer by a website and stored on your computer. Cookies are non-executable and cannot be used to install malware. They allow websites to

recognize visitors when they return and include basic information about them that is checked and updated every time you visit the website. Some of the cookies that MaimonWealth sets when you visit any of our websites are essential to the working functionality of the site. Performance cookies are another type of cookies uses to provide with you a better user experience and to improve how content on our website is presented.

Marketing cookies are also set usually by third party advertising networks to ensure we are providing you with targeted adverts more relevant to you and your interests. If you do not want to receive non-mandatory cookies, you can manage your preferences. If you use our web services without blocking cookies, you are actually consenting to the cookies.

If you don't want to receive cookies, you can modify your browser to refuse cookies altogether, or to simply notify you when cookies are sent. You can also delete cookies that have already been sent. You can do this by modifying your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit <http://www.aboutcookies.org> , which contains comprehensive information on how to manage cookies on a wide variety of desktop browsers.

How does MaimonWealth keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In particular, we:

- Hold personal information in secure facilities and where the information is held electronically, on secure servers.
- Use encrypted transmission links whenever we can.
- Use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control access to systems and data.

Retention of personal information

The period for which we will retain personal information will vary depending on the purposes for which it was collected, as well as the requirements of any applicable law or regulation. The retention of your personal information will be subject to periodic review. We may keep an anonymized form of your personal information, which will no longer refer to you without time limits, to the extent that we have a legitimate and lawful interest in doing so.

Minors

Our services are not available for users under the age of 18 (or the age of legal consent for the jurisdiction the user is located in) (a “minor”). We do not knowingly collect personal information from or about minors. If you are a minor, you should not download or use any of our services nor provide any personal information to us.

If we become aware that a minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [privacy@maimonwealth.com](mailto:privacy@maimonwealth.com).

### Personal Data transfers

Subject to certain conditions, we may transfer your personal information to a third party in countries outside the EEA for further processing in accordance with the purposes set out in this Privacy Policy. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organization, contractual or other lawful means.

### Changes to this Privacy Policy

The Policy will be reviewed from time to time to take account of changes to our operations or practices and, to make sure it remains appropriate to any changes in law, technology and the business environment. Any personal information held will be governed by our most current Policy.

When we update our Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

### HOW TO CONTACT US

MaimonWealth is the controller of your personal information

Questions, comments, complaints and requests regarding your data or this privacy policy are welcomed and should be addressed to us at [privacy@maimonwealth.com](mailto:privacy@maimonwealth.com).