

PRIVACY POLICY

October 2026

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Version Control

Version	Author	Date	Description of Changes
1	Compliance Officer/AMLCO	02 July 2024	Initial Policy
2	Compliance Officer/AMLCO and DPO	23 December 2025	Enhanced governance, CySEC AML Directive obligations, MiFID II obligations, Appropriateness testing/ scoring, Retention of records, DPO
3	Compliance Officer/AMLCO and DPO	21 October 2026	Updated to reflect the change of the Company's name to Hoxton Wealth (Europe) Ltd, its inclusion in the Hoxton Wealth Group and the CySEC approval letter ref. 7.1.623 dated 4 August 2026. Data sharing within the Group; removal of the reference to introducing brokers; DPO contact details.

1. Introduction

Hoxton Wealth (Europe) Ltd, formerly Hoxton Capital Management (Europe) Ltd, ("the Company") is a Cypriot Investment Firm (CIF) authorised by the Cyprus Securities and Exchange Commission (CySEC) with CIF License number 432/23.

Hoxton Wealth (Europe) Ltd is committed to protecting the personal data of individuals in line with the requirements of applicable law.

Hoxton Wealth (Europe) Ltd commitment applies to all individuals whose personal data the Company may process. "Personal Data" means any information relating to an identified or identifiable natural person. The Company acts as a controller in relation to such personal data.

This Privacy Policy or Notice describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

We may make changes to this Notice from time to time and it is important that you check this Notice for any updates. Any personal information we hold will be governed by our current privacy notice. If we make changes we consider to be important, we will communicate them to you.

Please note that this notice is addressed to customers and potential customers.

2. Personal Information We May Collect

When you create an account with the Company, we require you to provide your first and last name, e-mail address, details about your financial status, your residential address, phone number, date of birth, a copy of your national identity card or passport or driving license, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address, credit card or bank card details, Tax residence and Tax Identification Number, profession and employment details, knowledge and experience in trading, risk tolerance and risk profile and other information we may consider necessary to our functions and activities and in order to be in a position and be permitted to provide our services to you.

If the Company requests you to provide it with personal data and you fail to do so, the Company may not be in a position to provide a service and/or enter into an agreement with you, in which case it will inform you accordingly.

The abovementioned data are collected by the Company when you are going to open an account with the Company. It is required by the AML Law (the Prevention and Suppression of Money laundering and

Terrorist Financing Law of 2007 L. 188(I)/2007 as amended from time to time) and CySEC AML Directive that the Company collects the necessary data for verifying your identity, constructing your economic profile, monitoring your account and verifying the source of funds (where necessary).

Additionally, we use this data to set up and administer your account, and to provide technical and customer support.

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website.

These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on on our Website.

If you are a corporate client we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary in order to be compliant with our legal and regulatory requirements.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you.

These recordings will be our sole property and will constitute evidence of communication between us. It should be noted that we are obliged by Law 87(I)/2017 to keep records of all telephone conversations and electronic communications that are related to the provision of investment services .

3. Legal Ground for personal Data processing:

As a Cyprus Investment Firm authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC"), the Company processes personal data where necessary to comply with statutory obligations imposed under:

- The Investment Services and Activities and Regulated Markets Law 87(I)/2017 (MiFID II)
- The Prevention and Suppression of Money Laundering and Terrorist Financing Law 188(I)/2007
- Applicable CySEC Directives, Circulars and regulatory decisions

Where processing is required to comply with the above legal obligations, such processing is mandatory and cannot be restricted or objected to by the data subject to the extent permitted by law.

We may process your personal data for one or more lawful bases of processing ("Lawful Basis") depending on the specific purpose for which we are using your data.

The Lawful Basis are the following:

- to perform our contractual obligations towards you
- to be compliant with applicable legal and regulatory requirements
- to pursue our legitimate interests

Where our use of your personal information does not fall under one of the abovementioned Lawful Basses we will require you to provide your consent.

Such consent shall be freely given by you and you will have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

4. How we use your personal data:

Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

a) where required by law or a court order by a competent Court.

b) where requested by CySEC or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients.

c) to government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests.

d) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.

e) where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority.

f) to such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services.

g) to payment service providers and banks processing your transactions.

h) to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well.

i) only to the extent required and only the contact details to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement.

j) only to the extent required, to other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form.

k) where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority.

l) to anyone authorised by you.

m) to any other company in the same group as the Company (the Hoxton Wealth Group), where lawful and necessary for the purposes described in this Policy.

n) to any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or other relevant agreements.

o) to successors or assignees or transferees or buyers, with ten Business Days prior Written Notice to the Client; this will happen in the event that the Company decides to sell, transfer, assign or novate to a third party any or all of its rights, benefits or obligations under the Agreement with you or the performance of the entire Agreement subject to providing 15 Business Days Prior

Written Notice to the Client. This may be done without limitation in the event of merger or acquisition of the Company with a third party, reorganisation of the Company, winding up of the Company or sale or transfer of all or part of the business or the assets of the Company to a third party.

p) Client Information is disclosed in relation to US taxpayers to the Inland Revenue in Cyprus, which will in turn report this information to the IRS of the US according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between Cyprus and the US.

q) The Company conducts ongoing monitoring of the business relationship for regulatory compliance purposes. This includes periodic review of client information, reassessment of risk classification, and verification of source of funds and wealth where required by law. Such monitoring is performed throughout the duration of the client relationship and for the legally required retention period thereafter.

5. The safety of your personal data

Hoxton Wealth (Europe) Ltd takes the appropriate measures to ensure a level of enhanced security to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

The Company implements appropriate technical and organisational measures such as data encryption, access management procedure, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy, etc. Additionally, the Company limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's personal data on the Company's instructions and they are subject to a duty of confidentiality.

Your personal data may be stored electronically or in paper form.

6. Automated decision – making and Profiling

In order to provide investment services in accordance with the Investment Services and Activities and Regulated Markets Law 87(I)/2017 and the relevant CySEC Directives, the Company is required to assess certain aspects of the client's profile prior to the provision of services.

Such assessment includes evaluation of the client's:

- knowledge and experience in the relevant investment field,
- financial situation, including ability to bear losses, and
- investment objectives, including risk tolerance and time horizon.

The Company applies structured assessment methodologies and internal scoring mechanisms for the purposes of complying with suitability and, where applicable, appropriateness and AML/CFT obligations.

These assessments:

- Are required under applicable financial services legislation;
- Involve professional judgement and meaningful human oversight;
- Are subject to monitoring and review by the Compliance function;
- Are designed to protect client interests and ensure regulatory compliance;
- Are implemented with appropriate technical and organisational measures to minimise inaccuracies, prevent discriminatory outcomes and safeguard personal data.

No decision producing legal or similarly significant effects is taken solely by automated means without meaningful human intervention.

Where the Company provides investment advice a suitability assessment is conducted.

7. How we treat your personal data for marketing activities and whether profiling is used for such activities

The Company maintains an internal control environment designed to safeguard personal data, including segregation of duties, access control mechanisms, and oversight by the Compliance and Risk Management functions We may process your personal data to tell you about products, services and offers that may be of interest to you or your business.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services. This information helps the Company to improve its

services, customise browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if wehave your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so. You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time the Data Protection Officer of the Company at:

Hoxton Wealth (Europe) Ltd
Mesogiou 15, Upper Floor, 7041, Larnaca, Cyprus
Email: dpo@hoxtonwealth.eu
Tel: +357 24332522
Website: www.hoxtonwealth.com/eu

How long we store your personal data for

We will only retain your personal data for as long as we reasonably require it for legal or business purposes subject to a minimum of five (5) years following the termination of the business relationship, and where requested by the CySEC for a period of up to seven (7) years, after termination of the Agreement.

In determining data retention periods, we take into account local laws, contractual obligations, and the expectations and requirements of our customers.

When we no longer need personal data, we securely delete or destroy it.

For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

8. Transfers of personal data to third countries

Copies of your agreement with us may be transferred to and stored at banking institutions in a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who works for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that where we carry out such transfers this will be made subject to applicable, Cyprus laws and where required subject to the appropriate safeguards. You may contact the Company in order to be informed of the appropriate or suitable safeguards (as the case may be). The Company remains responsible for ensuring that all outsourced service providers processing personal data on its behalf comply with applicable data protection requirements. Outsourcing arrangements are subject to due diligence, contractual safeguards and ongoing monitoring in accordance with regulatory obligations applicable to Cyprus Investment Firms.

Where the Company engages regulated custodians, product providers, or service providers operating outside the European Economic Area, transfers of personal data may occur as part of the provision of investment services,such transfers will comply with the General Data Protection Regulation (Regulation EU 2016/679, and hence we may in some cases rely on a Commission Adequacy decision, or appropriate safeguards (e.g. applicable standard contractual clauses, binding corporate rules, the EU US Privacy Shield or any other equivalent applicable arrangements) or other grounds provided by the GDPR.

You may contact the Company in order to be informed of the appropriate or suitable safeguards.

The Company may disclose personal data to competent supervisory or enforcement authorities where required by law, including but not limited to:

- The Cyprus Securities and Exchange Commission (CySEC)
- The Unit for Combating Money Laundering (MOKAS)
- Tax or judicial authorities

Such disclosures are made strictly in accordance with statutory reporting obligations.

9. Your rights as a data subject

Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.

Right of rectification – you have a right to request from us to correct the personal data we hold about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation under Cypriot or EU law), the Company acting as your controller will erase your personal data from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply the Company will transfer your personal data to another organisation.

Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

In respect to the aforementioned rights, we will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data. You can send the relevant request to the following e-mail address: dpo@hoxtonwealth.eu

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

10. Contacting us about this Policy or making a complaint

If you have any queries about the contents of this Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Data Protection Officer

Hoxton Wealth (Europe) Ltd
Mesogiou 15, Upper Floor, 7041, Larnaca, Cyprus
Email: dpo@hoxtonwealth.eu
Tel: +357 24332522
Website: www.hoxtonwealth.com/eu

We try to respond to your request without undue delay and in any case within one month of receipt of the request. In case that your request takes us longer than one month we will notify you accordingly and keep you updated. In this respect it should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. Nonetheless and where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either:

(a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested;

or (b) refuse to act on the request

If you are not satisfied with our response to your complaint and/or your request was not handled within the specified timeframes, you have the right to lodge a complaint with our supervisory authority, the Cyprus Data Protection Commissioner. Alternatively, you also have the right to lodge a complaint with the data protection authority of your country of residence.

You can find information about how to contact the Cyprus Data Protection Commissioner on the following website: http://www.dataprotection.gov.cy