

PRIVACY POLICY

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Version 20250601

We have prepared this Privacy Policy in accordance with the information obligation under Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation – "GDPR").

Please read this Privacy Policy carefully.

WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The controller of your personal data is X Allocations, with its registered office at [REDACTED]. If you have any questions regarding the processing of your personal data, you can contact us at connect@xallocations.com or +48-7-8113-8113.

HOW CAN YOU CONTACT X ALLOCATIONS?

You can contact X Allocations:

- by email: connect@xallocations.com,
- by phone: +48-7-8113-8113,
- by post: [REDACTED].

We inform you that we have appointed a Personal Data Protection Inspector, whom you can contact in all matters related to the processing of your personal data by e-mail: connect@xallocations.com.

WHERE DO WE OBTAIN YOUR PERSONAL DATA FROM, AND WHAT CATEGORIES OF DATA DO WE PROCESS?

We obtain your personal data directly from you. Depending on the specific situation, we may also receive it from entities to which you have given consent for data transfer (e.g., entities co-organizing educational events with us) or from persons representing you based on a granted power of attorney.

From the above sources, we may collect the following data:

- Personal identification data

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- Contact details
- Socio-demographic data (e.g., employment status, education level)
- Data required for tax settlements (e.g., relevant tax office and tax identification number for individuals conducting business)
- Bank account number

If you apply for the status of a professional client or an experienced retail client, we may also process your personal data related to:

- Professional experience and financial services/products knowledge
- Professional certifications
- Educational background
- Information about your assets and investment history

If you are an entrepreneur, we may collect some of your data from public sources, such as the National Court Register, the Central Register and Information on Economic Activity, the Central Register of Beneficial Owners, or similar sources in other countries, as well as from private entities and business intelligence agencies that collect and share information about entrepreneurs.

The collection of the above data is particularly necessary for contract conclusion and for fulfilling legal obligations, such as anti-money laundering requirements.

In exceptional cases, we may obtain information about you from whistleblowers.

We collect personal data of individuals representing you or acting on your behalf from the same sources as your data, as well as directly from you.

FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

In relation to clients

Taking actions prior to entering into a contract and fulfilling contractual obligations.

Description of data processing: X Allocations takes actions at your request before entering into a brokerage services agreement. X Allocations also takes actions to fulfill the brokerage services agreement, including, among other things, verifying your identity, opening and managing your account, processing deposit and withdrawal requests, managing relationships with you via electronic communication, phone calls, or chat messages, and executing transactions on financial instruments.

Although X Allocations acts as an Introducing Broker for a Regulated Investment Firm and does not operate a Dealing Desk or process client withdrawals, X Allocations may obtain such information in coordination with the Regulated Investment Firm.

Legal basis for data processing: The processing of your personal data is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into a contract (Article 6(1)(b) of the GDPR). For biometric image processing, the legal basis for data processing is your explicit consent (Article 9(2)(a) of the GDPR).

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Retention period of personal data: If you have an investment account with the Regulated Investment Firm recommended by X Allocations, your personal data will be retained for the duration of the agreement. Additionally, after the agreement ends, X Allocations will process your data for the period required to fulfill any legal obligations and for the statute of limitations on claims applicable to both X Allocations and the Regulated Investment Firm, as prescribed by law.

If you initiated the process of opening an account with the Regulated Investment Firm but did not complete it, your personal data will be processed for 120 days from the start of the account opening process.

Taking actions in response to a complaint, claim, appeal, or any other request.

Description of data processing: The consideration of complaints, claims, appeals, or any other request submitted by you by X Allocations or to the Regulated Investment Firm once they inform X Allocation about your activity.

Legal basis for data processing: The processing of personal data is necessary to fulfill a legal obligation imposed on X Allocations, arising from laws such as the Consumer Rights Act or the Act on Complaints Handling by Financial Market Entities and the Financial Ombudsman (Article 6(1)(c) of the GDPR).

The processing of personal data is also necessary to take actions aimed at performing the contract if you are our client, and the legal obligation basis does not apply (Article 6(1)(b) of the GDPR).

Retention period of personal data: In this case, the retention period of your personal data will be the time necessary to handle the complaint, claim, or other request in accordance with the contract or legal regulations. Please note that this period may be extended by the statute of limitations for claims as prescribed by law.

The execution of obligations arising from regulations related to anti-money laundering (AML) and the financing of terrorism, including profiling.

Description of data processing: Receiving information about transactions registered by the Regulated Investment Firm and assessing the level of money laundering and terrorism financing risks by both the Regulated Investment Firm and X Allocations, as well as implementing financial security measures (including client and beneficial owner identity verification) to prevent money laundering and terrorism financing, and the associated archiving.

Legal basis for data processing: The processing of personal data is necessary to fulfill a legal obligation imposed on X Allocations (Article 6(1)(c) of the GDPR).

Retention period of personal data: We may store:

- a) Copies of documents and information obtained through the application of financial security measures;
- b) Evidence confirming completed transactions and transaction records, including original documents or copies of documents necessary to identify the transaction; for 5 years, counting from the date the business relationship with you

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ends or the date occasional transactions were conducted.

We also store the results of risk assessments and analyses of business relationships for 5 years, counting from the date they were conducted.

The fulfillment of obligations arising from regulations related to conducting brokerage activities and the activities of introducing brokers of an investment firm

Description of data processing: Fulfilling X Allocation's obligations arising from regulations related to brokerage activities, such as: recording telephone conversations, saving electronic correspondence and related archiving, determining your category (whether you are a retail client, professional client, or eligible counterparty), profiling for the purpose of defining the target group, assessing the adequacy or suitability of services, fulfilling obligations related to collecting specific information and verifying clients (e.g., statements related to the MIFID questionnaire).

Legal basis for data processing: The processing of personal data is necessary to fulfill a legal obligation imposed on X Allocation (Article 6(1)(c) of the GDPR).

Retention period of personal data: The retention period of your personal data is determined by specific regulations. For example, under the Financial Instruments Trading Act, the period for retaining your data, which is created, transmitted, or received in connection with brokerage services, is 5 years, counting from the first day of the year following the year in which

the documents or information carriers were created or received.

Fulfilling X Allocation's obligations arising from other legal regulations, such as tax or accounting laws.

Description of data processing: X Allocation fulfills obligations arising from other legal provisions, including: collecting specific information and verifying clients (e.g., statements related to FATCA, CRS, EMIR, MIFIR), creating reports on executed transactions, and submitting them to the relevant financial institutions and supervisory authorities.

Legal basis for data processing: The processing of personal data is necessary to fulfill a legal obligation imposed on X Allocation (Article 6(1)(c) of the GDPR).

Retention period of personal data: The retention period of your personal data is determined by specific regulations. For example, under the Tax Ordinance, we are required to retain your tax documentation for a period of 5 years, counting from the end of the calendar year in which the tax payment deadline expired.

Establishing and pursuing claims or defending against claims.

Description of data processing: Taking actions related to the establishment and pursuit of claims by X Allocations or the Regulated Investment Firm, or taking actions to defend against claims directed against X Allocations or the Regulated Investment Firm.

Legal basis for data processing: The processing of personal data is necessary to fulfill the legitimate interest of X

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Allocations or the Regulated Investment Firm, which involves the possibility of establishing or pursuing claims, as well as defending against claims directed at X Allocations or the Regulated Investment Firm (legal basis: Article 6(1)(f) of the GDPR in conjunction with Article 9(2)(f) of the GDPR).

Retention period of personal data: The statute of limitations for claims owed to or against X Allocations or the Regulated Investment Firm is defined by law. For example, according to the Civil Code, the statute of limitations for claims is:

- 6 years from the performance of the contract for consumer claims;
- 10 years from the performance of the contract for consumer claims confirmed by a final court or authority decision, arising and not expired before July 9, 2018 (except for accounting documents) and until the final conclusion of the case, and for the period necessary due to accounting regulations or audit obligations.

Contacting you for purposes related to permitted marketing activities, through available communication channels, particularly via email, SMS, and phone.

Description of data processing: Taking actions by X Allocation aimed at promoting the Regulated Investment Firm's products and services and conducting marketing communication through channels to which you have consented.

Legal basis for data processing: The legal basis for processing personal data in the case of a client is the legitimate interest of X Allocation (Article 6(1)(f) of the GDPR), which involves the possibility of promoting (direct marketing) products and services of the Regulated Investment Firm.

Retention period of personal data: The period of existence of X Allocation or the Investment Firm's legitimate interest, unless you object to the processing of your data for marketing purposes.

Maintaining contact, scheduling meetings, and responding to questions.

Description of data processing: Taking actions aimed at maintaining contact with the client and providing answers to any questions asked.

Legal basis for data processing: The processing of personal data is necessary to fulfill the legitimate interest of X Allocation and the Regulated Investment Firm, which involves taking actions to maintain contact with the client and respond to questions (Article 6(1)(f) of the GDPR).

Retention period of personal data: Personal data may be processed until the questions are answered or until the statute of limitations for claims expires.

Researching and improving the quality of services.

Description of data processing: Carrying out analytical activities aimed at verifying and improving the quality of services.

Legal basis for data processing: The processing of personal data is necessary to fulfill the legitimate interest of X Allocation

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and the Regulated Investment Firm, which involves verifying and improving the quality of services (Article 6(1)(f) of the GDPR).

Retention period of personal data: Personal data may be processed until an objection is raised.

In relation to prospects

Contacting you for purposes related to permitted marketing activities, through available communication channels, particularly via email, SMS, and phone.

Description of data processing: Taking actions by X Allocation aimed at promoting products and services and conducting marketing communication through channels you have consented to.

Legal basis for data processing: The legal basis for processing personal data in the case of a potential client is consent for the processing of personal data (Article 6(1)(a) of the GDPR).

Retention period of personal data: Until you withdraw your consent.

Taking actions related to the creation of a demo account.

Description of data processing: Taking actions by X Allocation aimed at promoting products and services of the Regulated Investment Firm and conducting marketing communication through channels you have consented to.

Legal basis for data processing: The legal basis for processing personal data in the case of a potential client is consent for the

processing of personal data (Article 6(1)(a) of the GDPR).

Retention period of personal data: Until you withdraw your consent.

Actions related to receiving complaints, claims, appeals, or other requests.

Description of data processing: The consideration of complaints, claims, appeals, or other requests submitted by you by X Allocations.

Legal basis for data processing: The processing of personal data is necessary for the legitimate interest of X Allocations in addressing and providing you with a response to a complaint, claim, appeal, or other request (Article 6(1)(f) of the GDPR). In some cases, the legal basis for processing such data may be fulfilling a legal obligation of X Allocations, arising from, for example, the Consumer Rights Act or the Act on the handling of complaints by entities in the financial market and the Financial Ombudsman (Article 6(1)(c) of the GDPR).

Retention period of personal data: In this case, the retention period for your personal data will be the time necessary to handle the complaint, claim, or other request in accordance with the contract or legal provisions. Please note that this period may be extended by the statute of limitations for claims under the applicable law.

Establishing and pursuing claims or defending against claims.

Description of data processing: Actions related to establishing and pursuing claims by X Allocations or the Regulated

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Investment Firm or actions aimed at defending against claims made against X Allocations or the Regulated Investment Firm.

Legal basis for data processing: The processing of personal data is necessary for the legitimate interest of X Allocations or the Regulated Investment Firm in establishing or pursuing claims, as well as defending against claims made against X Allocations or the Regulated Investment Firm (legal basis: Article 6(1)(f) of the GDPR).

Retention period of personal data: The period for the statute of limitations for claims held by X Allocations or the Regulated Investment Firm or against X Allocations or the Regulated Investment Firm as stipulated by applicable law.

Execution of obligations arising from regulations concerning brokerage activities.

Description of data processing: X Allocations or the Regulated Investment Firm fulfilling obligations arising from regulations related to brokerage activities, such as recording phone calls, saving electronic correspondence, and related archiving.

Legal basis for data processing: The processing of personal data is necessary for the fulfillment of the legal obligation imposed on X Allocations (Article 6(1)(c) GDPR).

Retention period of personal data: The period for storing your personal data results from specific regulations. For example, according to the Act on Trading in Financial Instruments, the period for

storing your data prepared, transmitted, or received in connection with the brokerage services provided is 5 years, counting from the first day of the year following the year in which the documents or information carriers were created or received.

Maintaining contact, scheduling meetings, and responding to inquiries.

Description of data processing: Actions taken to maintain contact with the client and respond to any questions asked.

Legal basis for data processing: The processing of personal data is necessary to fulfill the legitimate interest of X Allocations, which is to take actions aimed at maintaining contact with the client and providing responses to the inquiries (Article 6(1)(f) GDPR).

Retention period of personal data: Personal data may be processed until the response is provided to the inquiry or until the statute of limitations for claims has expired.

In relation to counterparties, contractors and representatives

Verification of authority to act on behalf of the counterparty and communication regarding the performance of the contract.

Description of data processing: X Allocation undertakes actions aimed at verifying the validity of the authority to act on behalf of the counterparty, including verifying the relevant information in public registers, and contacting the counterparty regarding the performance of the contract.

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Legal basis for data processing: The legal basis for the processing of personal data is:

- in the case of company owners – performance of the contract (Art. 6(1)(b) GDPR)
- in the case of representatives and individuals contacting the company – legitimate interest of X Allocation (Art. 6(1)(f) GDPR).

Retention period of personal data: The retention period is the duration of the concluded contract or until the negotiations are concluded.

The fulfillment of obligations arising from other legal provisions, e.g., tax and accounting regulations.

Description of data processing: X Allocation fulfills obligations arising from other legal provisions, such as: fulfilling obligations related to collecting specific information and verifying clients (e.g., statements related to FATCA, CRS, EMIR, MIFIR), creating reports on executed transactions, and submitting them to relevant financial institutions and regulatory authorities.

Legal basis for data processing: The processing of personal data is necessary to fulfill a legal obligation imposed on X Allocation (Art. 6(1)(c) GDPR).

Retention period of personal data: The retention period of your personal data is determined by specific regulations. For example, according to the Tax Code, we are required to retain your tax documentation for a period of 5 years, starting from the end of the calendar year in which the tax payment deadline expired.

Establishing and pursuing claims or defending against claims.

Description of data processing: Taking actions related to establishing and pursuing claims by X Allocations or the Regulated Investment Firm or taking actions to defend against claims made against X Allocations or the Regulated Investment Firm.

Legal basis for data processing: The processing of personal data is necessary for the legitimate interest of X Allocations or the Regulated Investment Firm, which is to establish or pursue claims, as well as to defend against claims made against X Allocations or the Regulated Investment Firm (legal basis: Art. 6(1)(f) GDPR).

Retention period of personal data: The limitation period for claims held by X Allocations or the Regulated Investment Firm or against X Allocations or the Regulated Investment Firm is determined by the relevant legal provisions.

In relation to users of website, desktop software or mobile apps

Ensuring proper execution of services via the website/application.

Description of data processing: Using cookies to ensure the proper functioning of the website and application, as well as to enable the provision of online services in accordance with the terms and conditions.

Legal basis for data processing: Processing is necessary for the performance of a contract to which you are a party, or to take actions at your request before entering into a contract (Art. 6(1)(b) GDPR).

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Retention period of personal data: Until the cookies are removed from the device. Detailed retention information is provided in the cookie policy.

Analytical purpose

Description of data processing: Using cookies allows us to measure the number of visits and gather information about traffic sources, enabling us to improve the functionality of our website and application. They also help us learn which pages and features are most popular or how visitors navigate through them.

Legal basis for data processing: The processing of personal data is necessary for the legitimate interest of X Allocation, which is to improve the quality of the services provided (legal basis: Art. 6(1)(f) GDPR).

Retention period of personal data: Until the purpose is fulfilled, the objection is raised, or the cookies are removed from the device.

Marketing purposes

Description of data processing: We may use ads displayed on other websites to promote certain services, articles, or events.

Legal basis for data processing: The legal basis for processing personal data in this case is consent to process personal data (Art. 6(1)(a) GDPR).

Retention period of personal data: Until the purpose is fulfilled, the objection is raised, or the cookies are removed from the device.

In relation to whistleblowers

Handling Reports of Legal Violations and Conducting an Assessment of Their Validity

Description of data processing: Handling any reports of legal violations to the extent necessary to fulfill a task carried out in the public interest.

Legal basis for data processing: The processing of personal data is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR in conjunction with Art. 9(2)(g) GDPR).

Retention period of personal data: Documentation may be retained for a period of 5 years, starting from the first day of the year following the year in which the documents or information carriers were created or received.

In relation to persons indicated by the report

Handling reports of legal violations and conducting an assessment of their validity.

Managing all reports of legal violations to the extent necessary to fulfill a task carried out in the public interest.

Legal basis for data processing: The processing of personal data is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR in conjunction with Art. 9(2)(g) GDPR).

Retention period of personal data: Documentation may be retained for a period of 5 years, starting from the first day of the year following the year in which the

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documents or information carriers were created or received.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Introducing Broker Role of X Allocations

X Allocations operates as an Introducing Broker, a role that is entirely dependent on the Regulated Investment Firm—its principal. As an authorized agent of the Regulated Investment Firm, X Allocations is fully committed to ensuring complete transparency in all client-related matters.

In this capacity, X Allocations is obligated to relay all client information and any activities related to the Regulated Investment Firm. This includes any privacy-related data collected by X Allocations, which will be shared in full with the Regulated Investment Firm—its principal. This commitment ensures compliance with all regulatory requirements and reinforces the integrity of the partnership between X Allocations and the Regulated Investment Firm.

Partner Entities

We may share your personal data with partner entities, i.e., companies owned or controlled by X Allocation, or those under common control with X Allocation, or entities in continuous cooperation with X Allocation. These include, in particular, banks, investment firms, auditors, financial service providers, IT companies, consulting firms, or courier services. Data sharing occurs strictly to the extent necessary for cooperation.

Data Processors

We transfer your personal data to service providers processing your data on behalf of X Allocation, including IT service providers and solutions in the following categories:

- CRM (customer relationship management) tools,
- Video identity verification and document verification tools,
- Email communication tools,
- Call management and recording tools,
- Technological components of the multilateral trading facility (trading platform, bridge, data centers).

The entities to which we transfer your data are not data controllers; in each of the above cases, X Allocation remains the data controller. These providers process data solely based on a data processing agreement with X Allocation and exclusively according to its instructions.

Location

Providing X Allocation's services may require (depending on the scope of activities) the transfer of personal data to service providers located in other countries, including those outside the European Economic Area. If data is transferred to countries that do not ensure an adequate level of data protection, X Allocation applies safeguards such as: European Commission adequacy decisions, standard contractual clauses approved by the European Commission or a supervisory authority of an EU Member State, approved industry-specific codes of conduct, binding corporate rules.

Individuals whose personal data is processed have the right to obtain a copy of their data.

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Public Authorities

If authorized public authorities—such as law enforcement agencies, tax authorities, courts, or data protection supervisory bodies—request access to your personal data, X Allocation will share it only when legally required.

WHAT RIGHTS DO YOU HAVE REGARDING THE PROCESSING OF YOUR PERSONAL DATA?

Right to Object to the Use of Personal Data

In accordance with Article 21 of the GDPR, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data if we process it based on our legitimate interest, such as for marketing our products and services.

If your personal data is processed for marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, including profiling. If you object to processing for marketing purposes, we will no longer process your personal data for those purposes.

Right to Restrict Processing

According to Article 18 of the GDPR, you may request the restriction of processing of your personal data in the following situations:

- You contest the accuracy of your personal data (we will restrict processing for the time necessary to verify its accuracy).

- The processing is unlawful, but instead of requesting the deletion of your data, you request that its use be restricted.
- Your personal data is no longer needed for the original purposes of collection, but it is required for establishing, exercising, or defending legal claims.
- You have objected to the use of your data (we will restrict processing while we determine whether your interests, rights, and freedoms override our legitimate interests in processing your data).

Right to Access, Rectify, and Erase Personal Data

Under Article 15 of the GDPR, you have the right to obtain confirmation as to whether we are processing your personal data. If we are, you have the right to access your data and receive information about the purposes of processing, the categories of processed personal data, the planned retention period or the criteria used to determine it, your rights under the GDPR, the right to lodge a complaint with the supervisory authority, the sources of data collection (if not obtained directly from you), and any automated decision-making, including profiling, as described in Article 22(1) and (4) of the GDPR.

Additionally, you have the right to receive information about appropriate safeguards related to data transfers if your data is transferred to a third country or international organization.

You also have the right to obtain a copy of all personal data we hold about you and to notify us of any inaccuracies you may find. For any additional copies requested, we

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may charge a reasonable administrative fee. Please note that the right to obtain a copy of your data must not adversely affect the rights and freedoms of others.

If your personal data has changed or you wish X Allocations to correct the data we hold about you, please notify us immediately. The right to rectify personal data, as provided in Article 16 of the GDPR, applies only to incorrect data. Upon your request, we will amend, correct, or delete your personal data from our database, except where we are required to retain it by law or regulatory obligations necessary for providing services to you or maintaining business records.

Right to Data Portability

According to Article 20 of the GDPR, you have the right to receive your personal data in a structured, commonly used, and machine-readable format if processing is based on consent or a contract and carried out by automated means. You also have the right to request that your data be transferred directly from us to another data controller, where technically feasible.

Right to Lodge a Complaint with the Supervisory Authority

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data by X Allocations violates the GDPR. This right is provided under Article 77 of the GDPR. In Poland, the relevant authority is the President of the Personal Data Protection Office.

Right to Withdraw Consent

If your personal data is processed based on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

HOW LONG DOES IT TAKE TO PROCESS YOUR REQUEST?

If you submit a request to exercise any of the rights mentioned above, we will fulfill your request or refuse it without undue delay. However, we will provide information on the actions taken in response to your request under Articles 15–22 of the GDPR within a maximum of one month from the date of submission.

If we are unable to fulfill your request within one month due to its complexity or the number of requests received, we will process it within an additional two months. In such a case, we will inform you in advance of the extension and the reason for the delay.

IS PROVIDING YOUR PERSONAL DATA MANDATORY?

Providing your personal data for the purpose of entering into and performing a brokerage services agreement is either required by law or necessary for concluding and executing the agreement. If you refuse to provide the necessary personal data, or if its collection is required for us to fulfill our legal obligations, we will not be able to enter into, continue, or fulfill certain requests related to the agreement.

Providing identification data in a complaint, claim, or request is essential for us to review and respond to it. If you do not

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provide your personal data, we will not be able to enter into or perform the brokerage services agreement or respond to your inquiries.

WHEN AND TO WHAT EXTENT DO WE MAKE AUTOMATED DECISIONS AND USE PROFILING?

Profiling for Anti-Money Laundering and Counter-Terrorism Financing Compliance

We are legally required under anti-money laundering (AML) and counter-terrorism financing (CTF) regulations to assess the risk level of money laundering and terrorist financing and to apply security measures to prevent these activities.

As part of this process, we process your data to conduct a risk assessment and apply the necessary security measures. This assessment is based on predefined criteria, including economic, geographical, transactional, and behavioral factors. Based on this evaluation, you are automatically assigned to a specific risk group.

If you are classified as belonging to a risk group that we do not accept, an automatic block may be triggered, and we may not be able to establish a business relationship with you.

If an automated decision regarding your risk group affects your ability to access our services, you have the right to challenge this decision, express your viewpoint, or request human intervention (i.e., a manual review of your data and a decision made by a person).

Profiling for Target Group Classification

We are also required under product governance regulations to analyze the financial instruments we offer in terms of their suitability and appropriateness for customers belonging to target groups.

This analysis ensures that our financial instruments and their distribution strategy align with the needs, characteristics, or objectives of the designated target audience. As part of this process, we assess factors such as your risk tolerance and financial situation.

Based on the information you provide and the implemented solutions, we assign you to a specific target group. If an automated decision regarding your target group affects your eligibility for certain offers, you have the right to challenge this decision, express your viewpoint, or request human intervention (i.e., a manual review of your data and a decision made by a person).

COLLECTION OF ACCESS DATA AND LOG FILES

When you use our website for informational purposes only (i.e., without registering or providing additional information), we collect only the personal data that your browser transmits to our server. This data is necessary to display the website properly and to ensure its security and stability. The legal basis for processing this data is Article 6(1)(f) of the GDPR.

The following data is collected:

- IP address
- Date and time of access
- Time zone difference to Greenwich Mean Time (GMT)

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- Accessed content (specific page)
- HTTP status code / access status
- Transferred data volume
- Referrer URL (previously visited page)
- Browser type and version
- Operating system and interface
- Language and version of the browser software

This information is stored for security purposes (e.g., to investigate misuse or fraud) for a **maximum of 10 days** and is then deleted. If further retention is required for evidentiary purposes, the data is retained until the incident is fully resolved. Additionally, cookies are stored in your browser when using our website (see Section 5).

SSL/TLS ENCRYPTION

To ensure IT security and protect confidential data transmission (e.g., inquiries or account openings), our website uses SSL or TLS encryption. An encrypted connection can be recognized by the change in the browser's address bar from "http://" to "https://" and the presence of a lock icon. With SSL or TLS encryption activated, transmitted data cannot be read by third parties.

USE OF COOKIES

Our website uses cookies—small text files stored in your browser history—to enhance usability and website efficiency. You can block or delete cookies through your browser settings. Please note that restricting cookies may impact the functionality of the website.

A general opt-out for cookies used for online marketing purposes can be exercised via the opt-out page

Types of Cookies Used:

Functional Cookies – Ensure the proper functionality of our website. These cookies are stored for a maximum of 2 years and may facilitate:

- Saving user preferences (e.g., language, location, number of search results)
- Optimized video display settings
- Browser setting collection to ensure website compatibility
- Detection of misuse (e.g., multiple failed login attempts)
- Continuous page loading for better accessibility
- Saving login credentials for convenience

Affiliate Marketing Cookies – Measure the success of our affiliate marketing activities.

EXTERNAL LINKS

Our website contains links to third-party websites, typically identified by their respective URLs. We do not control the content or privacy policies of these external sites, and this privacy policy does not extend to them.

EMAIL COMMUNICATION

If you provide us with your email address, we will use it for communication purposes. You can withdraw consent at any time by contacting us. Please note that unencrypted email communication is not secure, and we recommend transmitting

confidential information via encrypted email or postal mail.

NEWSLETTER

With your consent, we send newsletters containing updates on products, services, market trends, promotions, and Forex/CFD trading tips. The legal basis for sending newsletters is Article 6(1)(a) of the GDPR.

Newsletter Subscription Process:

- You must provide a valid email address.
- Additional voluntary details may be used for personalized communication.
- We use a double opt-in process, where you must confirm your subscription via email.
- Your IP address and timestamps of registration/confirmation are stored for verification purposes.

You can unsubscribe at any time via the link in the newsletter, by emailing connect@xallocations.com, or by contacting us directly.

CONTACT FORM / LIVE CHAT

When you contact us via the website's contact form or live chat, we store the provided information to process your inquiry. This data is not shared without your consent. The legal basis for processing is Article 6(1)(a) of the GDPR.

Stored data is retained until:

- You request its deletion
- You revoke your consent
- The purpose for storage ceases to exist

Mandatory legal retention periods remain unaffected.

SOCIAL MEDIA LINKS

Our website includes social media icons (e.g., Facebook, Twitter, YouTube, LinkedIn, Instagram, etc.). These act as external links, meaning personal data is only transmitted when you click on them. Please refer to the respective providers' privacy policies for further details.

AFFILIATE MARKETING

We may use tracking cookies from affiliate network to measure sales/leads generated via affiliate marketing. These cookies do not store personal data; they only record information required for commission settlement between us and the referring partner. The legal basis for this processing is Article 6(1)(f) of the GDPR.

INTEGRATION OF GOOGLE MAPS

Our website integrates Google Maps to provide interactive maps. The provider is Google LLC, 600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

When you visit a page containing Google Maps, Google receives certain data (see Section 3). If you are logged into your Google account, this data may be associated with your profile. You can prevent this by logging out of your Google account before using the map function.

Google uses this data for advertising, market research, and demand-oriented website design. You can object to this data processing by adjusting your Google account settings. More information can be found in Google's Privacy Policy.

GOOGLE RECAPTCHA

We use Google reCAPTCHA to detect bots when entering data into online forms. The provider is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

More details on data collection and processing by Google can be found in Google's Privacy Policy and Opt-Out Settings.

Google is certified under the EU-U.S. Privacy Shield, ensuring compliance with European data protection standards (Certification).

Data Processing Agreement with Google:

We have entered into a data processing agreement with Google, requiring Google to protect user data and not disclose it to unauthorized third parties.

APPLICATIONS & 3rd PARTY SOFTWARE

Google Analytics – for collecting application performance statistics, including error reports and information on how users interact with the website

Refinitiv World Check – for AML identity verification

AppsFlyer – for tracking statistics on promotional campaigns and analyzing how users interact with the app.

CHANGE OF THE PRIVACY POLICY

In the course of the ongoing development of the Internet, it is necessary to adapt this privacy policy to changing circumstances on an ongoing basis. Such changes will be announced on this website in good time.