

PRIVACY POLICY

Your privacy is important to us. This Privacy Policy explains how we handle and treat your data when you

- register or visit **737 Exchange Ltd.** website or associated sites or pages (the "Site") or
- engage with us to use the products or services that **737 Exchange Ltd.** provides (our "Services"). It also includes information about individuals whose personal information we may process as a result of providing the Services to third parties and individuals who apply to work at **737 Exchange Ltd.**

1. PURPOSE OF THIS POLICY

This Privacy Policy ("Privacy Policy") explains our approach to any personal information that we collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information.

This Privacy Policy will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Policy is intended to assist you in making informed decisions when using the Site and our Services and/or to understand how your personal information may be processed by us as a result of providing the Services to third parties or when you apply to work at **737 Exchange Ltd.** Please take a moment to read and understand it.

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us.

2. WHO ARE WE AND WHAT DO WE DO

737 Exchange Ltd. is a limited liability company registered in Saint Lucia with company registration number 2024-00695, with registered address at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

737 Exchange Ltd. is a data controller responsible for your personal information processed via the Site.

3. HOW TO CONTACT US

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by email that you can find in **737 Exchange Ltd.** website

4. WHAT PERSONAL INFORMATION DO WE COLLECT

We may collect and process different types of personal data in the course of operating our business and providing our services. These include:

- Basic personal details such as your name and job title;
- Contact data such as your telephone number and postal or email address;
- Financial data such as payment related information or bank account details;
- Demographic data such as your address, preferences or interests;
- Website usage and other technical data such as details of your visits to our website or information collected through cookies and other tracking technologies;
- Personal data provided to us by or on behalf of our clients or generated by us in the course of providing our services, which may, where relevant, include special categories of personal data;
- Identification and other background verification data such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence/"know your client"/anti-money laundering laws and collected as part of our client acceptance and ongoing monitoring procedures;
- Recruitment related data such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to **737 Exchange Ltd.**;
- Data that you may provide to us in course of registering for and attending events or meetings, including access and dietary requirements; and
- Any other personal data relating to you that you may provide.

5. HOW WE OBTAIN THE PERSONAL DATA ABOUT YOU

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website, etc;
- Where we monitor use of, or interactions with, our website, any marketing we may send to you, or other email communications sent from or received by **737 Exchange Ltd.**;
- Third party sources, for example, where we collect information about you to assist with "know your client" checks as part of our client acceptance procedures or where we receive information about you from recruitment agencies for recruitment purposes; or
- Publicly available sources - we may, for example, use such sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes, e.g. LinkedIn.

6. HOW DO WE USE YOUR PERSONAL INFORMATION

We may use your information for the following purposes:

Fulfilment of Services

We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services to enable us to perform the Services. Please note also that our Terms of Business apply when we provide the Services.

What is our legal basis?

It is necessary for us to process your information to perform our obligations in accordance with any contract that we may have with you. It is in our legitimate interest or a third party's legitimate interest to use your personal information in such a way to ensure that we provide the very best client service we can to you or others.

Client services

Our Site uses various user interfaces to allow you to request information about our Services including electronic enquiry forms and a telephone enquiry service. Contact information may be requested in each case, together with details of other personal information that is relevant to your Service enquiry. This information is used in order to enable us to respond to your requests.

What is our legal basis?

It is in our legitimate interest or a third party's legitimate interest to use your personal information in such a way to ensure that we provide the very best client service we can to you or others.

Business administration and legal compliance

We use your personal information for the following business administration and legal compliance purposes:

- to comply with our legal obligations (including any Know Your Client or Anti-Money Laundering or Anti-Bribery, conflicts or similar obligations including, but without limitation, maintaining regulatory insurance);
- to enforce our legal rights;
- to protect the rights of third parties; and
- in connection with a business transaction such as a merger, or a restructuring, or sale.

What is our legal basis?

Where we use your personal information in connection with a business transition, to enforce our legal rights, or to protect the rights of third parties it is in our or a third party's legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

Recruitment

We use your personal information for the following recruitment purposes:

To assess your suitability for any position for which you may apply at **737 Exchange Ltd.** including partner level positions, associate positions, training contract or summer placements and also any business support or services role whether such application has been received by us online, via email or by hard copy or an in-person application.

To review **737 Exchange Ltd.**'s equal opportunity profile in accordance with applicable legislation to ensure that **737 Exchange Ltd.** does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

What is our legal basis?

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in

our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for **737 Exchange Ltd.** We will not process any special category data except where we are able to do so under applicable legislation or with your explicit consent.

Marketing communications

We carry out the following marketing activities using your personal information:

- Postal marketing
- Email marketing

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with Services (see the Client Insight and Analysis section below for more details of the information collected and how it is collected) to send you marketing communications.

What is our legal basis?

It is in our legitimate interest to use your personal information for marketing purposes.

We will only send you marketing communications where you have consented to receive such marketing communications, or where we have a lawful right to do so.

Client insight and analysis

We analyse your contact details with other personal information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services such as the Services you have viewed.

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Site, or from your mobile. This includes the following:

- an IP address to monitor Site traffic and volume;
- a session ID to track usage statistics on our Site;
- information regarding your personal or professional interests, demographics, experiences with our products and contact preferences.

Our web pages contain "cookies" "web beacons" or "pixel tags" ("Tags"). Tags allow us to track receipt of an email to you, to count users that have visited a web page or opened an email and collect other types of aggregate information. Once you click on an email that contains a Tag, your contact information may subsequently be cross-referenced to the source email and the relevant Tag. In some of our email messages, we use a "click-through URL" linked to certain website administered by us or on our behalf. Please see our cookie policy for further information.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, which parts of our Site are the most interesting and what kind of offers our registered users like to see.

We also use this information for marketing purposes (see the marketing section above for further details).

What is our legal basis?

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you and our other clients.

Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details, where available.

7. WHAT IS OUR LEGAL BASIS TO USE OR PROCESS YOUR PERSONAL INFORMATION

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you.

It is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

It is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

8. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH

737 Exchange Ltd. is a global international foreign exchange company and any information that we collect or that you provide to us may be shared and processed by **737 Exchange Ltd.**

We may also share personal information with a variety of the following categories of third parties as necessary:

- Our professional advisers such as lawyers and accountants.
- Government or regulatory authorities.
- Professional indemnity or other relevant insurers.
- Regulators/tax authorities/corporate registries.

Third parties to whom we outsource certain services such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers.

Third parties engaged in the course of the services we provide to clients such as counsel, arbitrators, mediators, clerks, witnesses, cost draftsmen, court, opposing party and their lawyers, document review platforms and experts such as tax advisors or valuers.

Third party service providers to assist us with client insight analytics, such as Google Analytics.

Third party postal or courier providers who assist us in delivering our postal marketing campaigns to you, or delivering documents related to a matter.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide the Services as effectively as we can.

9. OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES

Our Site use certain Tags, log files and other technologies of which you should be aware. Please see our Cookie Policy to find out more about the cookies we use and how to manage and delete cookies.

10. THIRD PARTY CONTRACTORS AND OTHER CONTROLLERS

As mentioned above, we may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers, who will process personal information on our behalf

and at our direction. We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

Further, we may appoint external data controllers where necessary to deliver the Services (for example, but without limitation, accountants, barristers or other third party experts including but without limitation **737 Exchange Ltd.** When doing so we will comply with our legal and regulatory obligations in relation to the personal information, including but without limitation, putting appropriate safeguards in place.

What is our legal basis?

It is necessary for us to perform our obligations in accordance with any contract that we may have with you.

It is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

11. WHERE DO WE TRANSFER YOUR DATA TO

In order to provide the Services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it.

If you are based within the European Economic Area (EEA), please note that where necessary to deliver the Services we will transfer personal information to countries outside the EEA.

737 Exchange Ltd. have signed a data sharing agreement which is based on the EU standard contractual clauses to ensure we will comply with our legal and regulatory obligations in relation to personal information, including having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

12. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR

For visitors to the Site, we will retain relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation or similar legislation around the world, or for longer if we are required to do so according to our regulatory obligations or professional indemnity obligations.

For Service provision to any client, we will retain relevant personal information for at least six years from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation or similar legislation around the world, or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations. We may then destroy such files without further notice or liability.

If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it.

13. CONFIDENTIALITY AND THE SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the

personal information that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.

All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

14. HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS

You have the following rights in relation to the personal information we hold about you:

Your right of access

If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to data portability

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or processing your personal information for direct marketing purposes.

Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority.

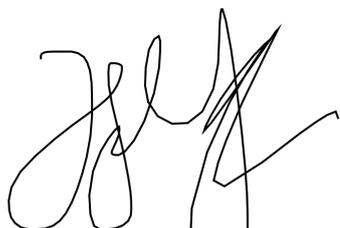
Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

15. COLLECTION OF INFORMATION BY THIRD-PARTY SITES AND SPONSORS

The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as **737 Exchange Ltd.** has no control over information that is submitted to, or collected by, these third parties

16. CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.



Rostyslav Zhmura