



# PRIVACY POLICY

Ultima Markets Cyprus Ltd  
([www.ultimamarkets.eu](http://www.ultimamarkets.eu)) with  
registration number HE423188 and  
Head Office Address at Georgiou  
Griva Digeni 122A, Kallinicos Court,  
Shop 1 – Upper Level, Neapolis 3101,  
Limassol, Cyprus, is an investment  
firm authorized and regulated by  
the Cyprus Securities and Exchange  
Commission with CIF license  
number 426/23.



## 1. Introduction

Ultima Markets Cyprus Limited (hereinafter referred to as the “**Company**” and / or “**We**”) is committed to ensuring that the personal data of our clients (*existing or potential*), as well as the visitors of the Company’s approved domain [www.ultimamarkets.eu](http://www.ultimamarkets.eu) (the “**Website**”) is handled and processed in line with the principles set out by the applicable Data Protection Legal Framework (*including the General Data Protection Regulation (EU) 2016/679 – the “**GDPR**”, the Law on the protection of natural persons against the processing of personal data and the free movement of such data, Law 125 (I)/2018 and/or other applicable regulations*).

This Privacy Policy sets out what to expect when the Company collects personal data about you and how the Company intends to use your personal data.

This Privacy Policy applies to all clients (*potential or existing clients*), and it also covers any individuals visiting our website as described further below. Further information to whom this Policy is addressed to can be found below at *Section 3*.

This Privacy Policy should be read in conjunction with our other corporate policies and procedures.

If you have any concerns, questions, queries or want to ask about the handling of your personal data, you may contact us at [contactus@ultimamarkets.eu](mailto:contactus@ultimamarkets.eu).

## 2. Data Protection Principles

The Company is legally required to comply with the six (6) Data Protection principles when processing personal data. These principles require that personal data:

- a. Shall be processed **lawfully, fairly and in transparent manner** in relation to the data subject.
- b. Shall be **collected only for specified, explicit and legitimate purposes**; and it must not then be further processed in any manner incompatible with those purposes.
- c. Shall be **adequate, relevant and limited to what is necessary in relation to the purposes** for which it is processed.
- d. Shall be **accurate and, where necessary, kept up to date**. Every reasonable step must be taken to ensure that data, which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
- e. **Shall not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed**. Personal data may be stored for longer periods provided it is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This is subject to the implementation of appropriate data security measures designed to safeguard the rights and freedoms of data subject.



- f. Shall be **processed in a manner that ensures its appropriate security**. This includes protection against unauthorised or lawful processing and against accidental loss, destruction or damage.

### 3. Whose personal data we process:

We collect or otherwise process personal data of the below categories of individuals:

- Individual clients and individuals who are considering entering into an agreement with us to offer services to them and/or former clients (collectively referred to as the “**Individual Clients**”).
- Individuals connected to Individual Clients (e.g. *authorised representatives and/or agents and/or employees*).
- Individuals connected or relevant to non-individual clients such as companies, other corporate clients or other legal or non-legal entities who are considering entering into or who have entered into an agreement with us under the terms of which we will provide services to them (the “**Client Entities**”). Such persons include shareholders, owners, employees, directors, officers, authorised representatives or agents (e.g. *external legal counsel or external auditors*) and other associates.

*Individual Clients and Client Entities are hereinafter collectively referred as Clients.*

- Other individuals that may be in any way connected with the work that we are engaged to provide to our Clients.
- Visitors to our Website.

### 4. How do we collect your data

We collect your personal data from the following sources:

- Directly from you (e.g., *information provided during the onboarding stage, or through email or telephone correspondence*).
- Background check agencies (e.g., *world compliance checks, etc.*).
- Due diligence investigations.
- Internet searches.
- Other third-parties when we seek to verify your identity – e.g., identity verification agencies etc.
- When you visit our website, e.g., collection of personal data when you complete any forms or provide your details via our Website, basic information collection about your visit provided by your browser.



## 5. What data about you we collect and process and Why

We collect, store and use the following categories of personal data:

- Personal Details such as name, date of birth, place of birth, nationality, education details, address, including documentation required for the verification of your identity e.g., passport, national identity card, utility bills, bank statements or source of funds evidence (e.g., *financial statements, tax returns etc.*).
- Contact Details such as telephone number, email address or other contact information.
- Financial data such as details about income and wealth, bank account information, tax residence and tax identification number.
- Trading Background Information such as historical data about the trades / investments you performed, details about your trading background, etc.
- Location data
- Communication between you and us via email or telephone call.
- Data obtained about you through public sources on the internet.
- Marketing preferences.

We shall collect, use or otherwise process your personal data when the applicable Data Protection Legal Framework allows us to. More specifically, and depending on the processing activity, we rely on the following lawful basis for collecting, using or otherwise processing your personal data:

- You have provided us specifically with your consent to the processing of your personal data – *Article 6(1)(a)* of the GDPR.
- Necessary for the Performance of a Contract – *Article 6(1)(b)* of the GDPR.
- Necessary for Complying with a Legal Obligation as a duly authorised investment firm – *Article 6(1)(c)* of the GDPR.
- To pursue our legitimate interests (except in cases where such interests are overridden by your interests or fundamental rights) – *Article 6(1)(f)* of the GDPR.

In cases where it is required to collect or otherwise use any special category data, e.g., your health data, the additional lawful bases for processing that we rely on, are:

- Carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights – *Article 9(2)(b)* of the GDPR.
- Protecting your vital interests or those of another person where you are incapable of giving your consent – *Article 9(2)(c)* of the GDPR.



## 6. Safety of your personal data

The Company takes the appropriate measures to ensure a level of security appropriate 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 in order to ensure that your personal data will not be accessed by unauthorized parties. These measures include among others 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 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.

## 7. Record Keeping

The Company shall retain your data as a duly authorised investment firm for a period of five (5) years, a timeframe that can be extended to seven (7) years, if requested by our Regulator.

Your data will be securely destroyed when it is no longer required for the fulfilment of the purposes for which such data was collected, and when you did not initiate any legal action against the Company. Hence, in the event where you initiate any legal action against the Company, then your personal data may be maintained for an additional timeframe so as to allow the Company to defend.

## 8. Data Sharing

There might be cases where the Company may be legally obliged to share your personal data either due to a court order, or by law, e.g., with Courts, Supervisory Authorities (e.g., CySEC) or with auditors (e.g., the appointed external or internal auditors of the Company) or with Governmental Authorities.

In each case where we might be required to share your personal data under the law, we ensure that such sharing / disclosure will be performed to the extent that is legally required.

While we do not transfer your personal data to any organisations or entities based in third countries, when such a transfer will be required, we ensure that we have appropriate safeguards in place in line with the Data Protection Legislation.



## 9. Your Rights

As an individual, you have certain rights (\*) regarding our processing of your personal data, as follows:

- **Request access to your personal data.** This enables you to receive a copy of the personal data we hold about you.
- **Request rectification of the personal data we hold about you.** This enables you to have inaccurate personal data rectified, or completed if it is not completed.
- **Request erasure of your personal data.** This enable you to ask us to delete your personal data, however, the right is not absolute, i.e., it applies only in certain circumstances.
- **Request the restriction of the processing of your personal data.** This is not an absolute right, i.e., it applies only in certain circumstances. When processing / using of personal data is restricted, the Company will be permitted to store the personal data but not to use it.
- **Request the transfer of your personal data to another party,** or to receive the personal data you have provided to the Company in a structured, commonly used and machine-readable format.
- **Object to processing your personal data** under certain circumstances.
- If you have provided consent for the processing of your data you have **the right** (in certain circumstances) **to withdraw that consent** at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

If you wish to exercise any of the aforementioned rights, please submit a request in writing with a copy of your Identification Documentation to [contactus@ultimamarkets.eu](mailto:contactus@ultimamarkets.eu) or to our Data Protection Officer at [dpo@ultimamarkets.eu](mailto:dpo@ultimamarkets.eu).

Additionally, you have the right to lodge a complaint to the Data Protection Commissioners' Office if you believe that we have not complied with the requirements of the GDPR with regard to your personal data. More information can be found [here](#).

*(\*) Kindly be informed that there might be certain exceptions to the applicability of the aforesaid rights. If you have any questions or concerns about the exercise of your personal data rights, please contact us at [contactus@ultimamarkets.eu](mailto:contactus@ultimamarkets.eu).*

## 10. Linking to other websites

Our website may contain links to external sites. In such a case, this Privacy Policy will no longer apply, since we are not responsible for the personal data handling practices followed by third-party sites. We, therefore, encourage you to consult the other sites' privacy policies.



## 11. Updates to this Privacy Policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any substantial changes affecting the manner of processing your personal data. We may also notify you in other ways about the processing / use of your personal data.

If you have any questions or need any further information about how the Company uses or processes your personal data, please contact us at [contactus@ultimamarkets.eu](mailto:contactus@ultimamarkets.eu) or [dpo@ultimamarkets.eu](mailto:dpo@ultimamarkets.eu).