JULY 2026

PALMS Securities

PRIVACY POLICY

Company No. 235507 GBC | FSC Licence No. GB26206284

1.0 Our Commitment to You

PALMS Securities recognises the importance of protecting the confidentiality, integrity and privacy of personal information that we collect, hold, use and disclose in the course of our regulated business. This Privacy Policy explains how PALMS Securities, hereinafter referred to as the "Company", "PALMS", "we", "us" or "our", collects and processes personal information relating to clients, prospective clients, beneficial owners, controllers, directors, authorised representatives, users of our website or platform, service providers and other relevant persons. The Company is licensed by the Financial Services Commission of Mauritius as an Investment Dealer and is bound by the Data Protection Act 2017 of Mauritius and other applicable legal and regulatory requirements.

PALMS Securities provides execution-only agency brokerage services in permitted financial instruments only, namely U.S.-listed equities and listed options traded on U.S. national securities exchanges. We do not offer OTC or Pink Sheet securities, FX, CFDs, cryptocurrency, digital assets, commodities, futures, swaps, binary options or any other product outside our approved business scope. Personal information is processed only where necessary for our business, regulatory, contractual, compliance, operational and legal purposes. This Policy will be reviewed periodically to reflect changes in our operations, technology, legal obligations, regulatory expectations and business environment. The most current version of this Policy will apply to the personal information that we hold.

2.0 Collection and processing of personal information

We may collect and process personal information directly from you, from your authorised representatives, from corporate documents and public sources, from third-party verification providers, from screening databases, from our clearing, custody and execution arrangements, and from your use of our website, client portal, mobile applications, trading platform or other electronic channels. The information collected may include:

- Identification and contact information, including your name, date of birth, nationality, country of residence, address, telephone number, email address, identification number, passport or national identity document, tax identification number and related identity-verification documents;
- KYC, AML/CFT and onboarding information, including information on source of funds, source of wealth, occupation, employer, business activity, financial profile, investment knowledge and

experience, beneficial ownership, control, authorised persons, sanctions, politically exposed person status and adverse-media results;

- Account, trading and transaction information, including account application details, account status, product permissions, listed equities and listed options activity, orders, executions, confirmations, statements, deposits, withdrawals, margin information, fees, communications and historical account records;
- Technical, device and usage information, including IP address, browser type, operating system, device identifiers, login records, platform activity, traffic data, location data, weblogs, cookies and other information generated when you access our website, platform, mobile applications or electronic services;
- Correspondence and support information, including emails, telephone calls, video calls, platform messages, complaints, instructions, confirmations, survey responses and any information you provide when communicating with us, our compliance function, our service providers or our authorised representatives.

3.0 How we use cookies

When you use our website, platform, portal or mobile applications, we may use cookies and similar technologies to distinguish you from other users, support secure login, maintain session functionality, remember preferences, improve website and platform performance, analyse usage and enhance the client experience. Certain cookies may be necessary for security, authentication and the operation of our services. Where required, we will request your consent for non-essential cookies. Further details may be set out in our Cookie Policy or cookie notice.

4.0 How we use the information

We use personal information only for lawful and legitimate purposes connected with the provision of our regulated services, our contractual relationship with you, our compliance obligations and the proper management of our business. In particular, we may use personal information for the following purposes:

- to assess account applications, verify identity, conduct customer due diligence, screen clients and connected parties against sanctions, PEP and adverse-media databases, determine eligibility, apply product permissions and manage ongoing due diligence;
- to provide, administer and support execution-only agency brokerage services in U.S.-listed equities and listed options, including account opening, order handling, trade execution support, clearing, custody, settlement, reporting, statements, confirmations, deposits and withdrawals;
- to comply with legal, regulatory, tax, AML/CFT, sanctions, market conduct, record-keeping, audit, reporting and risk-management obligations applicable to PALMS Securities as a Mauritius-licensed Investment Dealer;
- to manage our relationship with you, communicate service updates, respond to queries and complaints, maintain accurate records, protect our systems, prevent fraud, investigate suspicious or unauthorised activity and enforce our terms of business and account documentation;
- to improve our website, platform, systems, operational processes, client support, security controls and compliance framework, including through testing, monitoring, analytics and internal management reporting.

We will not sell your personal information. We will only use your information for marketing where permitted by law and where we have a lawful basis to do so. You may object to direct marketing at any time. We do not use personal information to offer products outside the Company’s approved scope, and any client communications must remain consistent with the Company’s execution-only, no-advice business model.

5.0 Who we disclose the information to

We may disclose personal information where necessary for our business, regulatory, contractual, compliance or legal purposes. Depending on the circumstances, personal information may be disclosed to:

- our clearing firm, executing brokers, custodians, banks, payment service providers, exchanges, market infrastructure providers, technology providers, identity-verification providers, sanctions-screening providers, data-hosting providers and other service providers used to operate and support client accounts and transactions;

- third-party consultants, contractors, professional advisers, auditors, compliance advisers, legal advisers, tax advisers, insurers and other persons who provide services to the Company and who may access personal information in the course of providing those services;
- any person or organisation acting on your behalf, or authorised by you, including your authorised representative, attorney, financial adviser, broker, accountant, auditor, corporate service provider, trustee, director, officer or other appointed agent;
- regulators, law enforcement agencies, courts, tribunals, tax authorities, financial intelligence units, competent authorities, clearing firms, banks, correspondent institutions or other parties where disclosure is required or permitted by law, regulation, court order, contractual requirement or regulatory expectation;
- trade repositories, exchanges, clearing organisations, market data providers or similar infrastructure providers, where required for transaction reporting, clearing, settlement, market conduct, audit or regulatory purposes;
- banks and payment institutions where they request information in connection with payments, deposits, withdrawals, source of funds checks, sanctions screening, fraud prevention or other compliance requirements;
- potential successors, assignees, transferees or purchasers in connection with a proposed or actual restructuring, transfer, merger, sale or other transaction involving all or part of the Company's business, subject to appropriate confidentiality safeguards;
- our affiliates, directors, officers, employees, agents and authorised representatives, where access is necessary for account administration, compliance, risk management, business operations or the provision of services;
- any other person where you have requested or consented to the disclosure, or where disclosure is otherwise necessary to protect our rights, comply with our obligations or provide the services requested by you.

6.0 Rights in relation to your personal information

Subject to the Data Protection Act 2017 and any applicable exemptions, you may have rights in relation to your personal information, including the right to request access to personal information we hold about you, the right to request correction of inaccurate or incomplete information, the right to object to certain processing, the right to request restriction of processing, the right to request erasure where legally available, and the right not to receive direct marketing communications.

To exercise your rights, you should contact us through the contact details published on our website or by contacting our Data Protection Officer. We may need to verify your identity before responding to a request. We may also request additional information to locate the relevant records and understand the scope of your request. Some rights may be limited where we are required to retain or process information for legal, regulatory, AML/CFT, sanctions, tax, audit, dispute resolution or record-keeping purposes.

Where permitted by law, we may charge a reasonable administrative fee or refuse a request that is manifestly unfounded, excessive, repetitive or otherwise not required to be fulfilled under applicable law. If you are dissatisfied with how we handle your personal information, you may contact us and, where applicable, lodge a complaint with the Data Protection Commissioner of Mauritius.

7.0 Safeguard Measures

We maintain appropriate technical, organisational and physical safeguards designed to protect personal information against unauthorised access, loss, misuse, alteration, disclosure or destruction. These measures may include access controls, password controls, secure storage, encryption where appropriate, system monitoring, staff confidentiality obligations, restricted access, vendor due diligence, backup procedures and internal policies governing the handling of personal information.

Access to personal information is limited to employees, officers, authorised representatives, service providers and advisers who require access for legitimate business, compliance, operational or legal purposes. Persons with access to personal information are expected to maintain confidentiality and use the information only for authorised purposes. Where we use third-party service providers, we require them to protect personal information and process it only for the purposes for which it was disclosed.

We do not keep personal information for longer than is necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law, regulation, AML/CFT obligations, tax rules, audit requirements, contractual obligations, dispute resolution needs or regulatory expectations. When information is no longer required, we will securely delete, destroy, anonymise or archive it in accordance with our record-keeping and data-retention procedures.

Although we take reasonable steps to protect personal information, the transmission of information through the internet, email, websites, mobile applications, trading platforms and other electronic channels is not completely secure. You acknowledge that we cannot guarantee the absolute security of information transmitted electronically and that you are responsible for keeping your account credentials, devices and communications secure.

8.0 Cross-border transfers of personal information

Because PALMS Securities provides access to U.S.-listed equities and listed options and uses third-party service providers, personal information may be transferred to, stored in or accessed from jurisdictions outside Mauritius. These jurisdictions may include the United States and any jurisdiction in which our clearing firm, executing brokers, custodians, banks, technology providers, KYC providers, screening providers, auditors, advisers, regulators or other service providers operate.

Where personal information is transferred outside Mauritius, we will take reasonable steps to ensure that the transfer is made in accordance with the Data Protection Act 2017 and that appropriate safeguards are applied where required. Such safeguards may include contractual protections, confidentiality obligations, due diligence on service providers, access restrictions and other measures designed to protect personal information.

9.0 Your consent and lawful basis for processing

By applying for an account, submitting personal information, using our website, platform or mobile applications, or otherwise engaging with PALMS Securities, you acknowledge that your personal information will be collected and processed as described in this Policy. Depending on the purpose, we may process personal information on the basis of your consent, the performance of a contract, compliance with a legal obligation, our legitimate interests, the establishment, exercise or defence of legal claims, or any other lawful basis available under applicable law.

You may withdraw consent where processing is based solely on consent. Withdrawal of consent will not affect processing carried out before the withdrawal and may affect our ability to provide services to you. In many cases, PALMS Securities must continue to process and retain personal information to comply with regulatory, AML/CFT, sanctions, tax, audit, record-keeping or legal obligations, even if you withdraw consent or close your account.

10.0 Personal information and other websites

Our website, platform or communications may contain links to third-party websites, applications, platforms or services. We are not responsible for the privacy policies, security practices or content of third-party websites or services that are not controlled by PALMS Securities. We recommend that you review the privacy policy of each third-party website or service before providing personal information to it.

11.0 How to contact us

If you have any questions about this Policy, wish to exercise your rights, want to update your information, have a complaint, or have questions about the security of our website, platform or mobile applications, you may contact PALMS Securities using the contact details displayed on our website or by sending an email at clientsupport@palmssecurities.com or by contacting the Company's Data Protection Officer.