

PRIVACY POLICY – SSIF Swiss Capital S.A.

This website is operated by SSIF Swiss Capital S.A., hereinafter referred to as “the Company”, identified as follows:

Operator: SSIF Swiss Capital S.A.

Phone: +40 21 408 42 00

Address: Bd. Dacia no. 20, Romana Offices, 4th floor, District 1, Bucharest, Romania

Data Protection Officer (DPO): Midori Preda

Email (DPO): dpo@swisscapital.ro

The Company processes personal data in accordance with Regulation (EU) 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ('GDPR'). This Privacy Policy applies to the Company and its branches and provides information regarding the processing of your personal data carried out by the Company in its capacity as data controller during the performance of its business activities.

The Company may update this Privacy Policy from time to time. By regularly consulting this page, you can ensure that you remain informed of how your data is being processed.

1. PROCESSING OF DATA COLLECTED THROUGH THE WEBSITE

The Company collects personal data from users of the website through voluntary registration in various website forms. Users who have or have had a contractual relationship with the Company are excluded from this chapter.

Categories of data collected:

- Name and surname

- Email address
- Phone number
- Interaction history

The Company does not collect data from persons under the age of 18 nor any special categories of data (racial or ethnic origin, political opinions, biometric data, etc.).

Purposes of processing:

- Providing assistance for demo trading accounts
- Managing registration for Swiss Capital events, confirming participation, notifying modifications, collecting feedback, and providing digital recordings (for webinars)
- Responding to “Request more details” forms
- Subscription and delivery of Swiss Capital newsletters
- Providing personalised offers strictly upon the user’s request
- Assessing the eligibility of prospective clients for certain services

Data transfer:

Personal data collected for these purposes is not transferred outside the Company. Data is stored only as long as necessary.

Rights of data subjects:

Users benefit from all GDPR rights including:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict or object to processing

- Right to data portability
- Right not to be subject to automated decision-making
- Right to lodge complaints or seek judicial remedy

Requests may be submitted to: dpo@swisscapital.ro

2. PROCESSING OF CLIENT DATA

The Company collects and processes personal data in the performance of its regulated capital-market activities, based on legal obligations, contractual requirements, legitimate interest, or consent.

Categories of data processed include:

- Identification and contact data: name, date/place of birth, national identification number, address, citizenship, phone, email, image, voice, signature
- Transaction data: account numbers, holdings, purpose and nature of trades
- Financial data: bank account, income, source of funds, investment value
- Socio-demographic data: education, occupation, employer
- Investment-related data: objectives, experience, risk tolerance

The Company does not process sensitive personal data.

Purpose of processing includes:

- Eligibility verification
- Contract conclusion and service provision
- Account administration, including password reset
- Recording communications as required by law
- Handling customer feedback

- Personalised marketing (with user consent)
- Providing relevant financial products
- Improving services
- Fraud prevention and legal compliance
- Internal and regulatory reporting

Data transfers may be made to:

- Internal departments
- Government and regulatory authorities
- Judicial/investigative bodies
- Lawyers, notaries, auditors
- Financial institutions and payment processors
- Entities involved in financial market infrastructure (issuers, Central Depository, etc.)
- Service providers supporting the Company's activities

Retention:

Data is stored only as long as required. Recorded phone calls and electronic communications are kept for 5 years.

Rights of data subjects:

Clients have the same rights as listed above. Requests may be submitted to dpo@swisscapital.ro.

3. PERSONAL DATA SECURITY

The Company implements internal policies, technical and organisational measures, and security standards to ensure confidentiality and integrity of personal data.

Users are advised to:

- Use antivirus, antispyware, and firewall software
- Log out of the trading platform when not in use
- Keep passwords confidential
- Remain vigilant about phishing and suspicious online activities

4. USE OF WEBSITE

Cookies:

Swiss Capital uses cookies to ensure proper display, authentication, interface personalisation, and improvement of website functionality. Additional details are available in the Cookie Policy.

Links to third-party websites:

The website may contain links to third-party sites not operated by Swiss Capital S.A. The Company is not responsible for their content, security, or privacy practices.

Swiss Capital disclaims any liability if such sites:

- infringe intellectual property rights
- contain inaccurate or misleading information
- are not fit for a particular purpose
- lack adequate security
- contain viruses or harmful elements
- contain defamatory or offensive material