



Privacy Policy

Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We respect your right to keep your Personal Information confidential and we understand your desire to avoid unwanted solicitations. We hope that by taking a few minutes to read our Privacy Policy, you will have a better understanding of what we do with the information you provide us and how we keep it private and secure.

We may periodically make changes to this Privacy Policy and will notify you of these changes by posting the modified terms on our website. In case of doubt, Personal Information we collect and hold is governed by the current version of this Privacy Policy on our website at the relevant time, we recommend that you revisit this Privacy Policy regularly.

What types of information does EQL-X collect?

We may collect both personal and aggregate visitor information from our Clients and visitors to our website. The term 'Personal Information' means information that can identify an individual or be identified back to an individual. Personal Information collected may include data such as:

- Contact information (name, address, phone number, email)
- Government issued IDs and employment information
- Account details, balances and transaction history
- Credit history and investment experience

The term 'aggregate visitor information' a compilation of information that does not identify an individual such as:

- Date and time of visit
- IP Addresses
- Demographic information
- Website pages visited
- Browser used

How does EQL-X collect my Personal Information?

We generally obtain Personal Information directly from you through our Account Application and supplementary forms. We may also obtain Personal Information from other sources including your transactions with us, our Affiliates or others.

What does EQL-X do with my Personal Information?

EQL-X considers your information to be a vital part of our relationship with you. If you provide us with your Personal Information, we will use your Personal Information in ways that are consistent with the reason for which it was provided. We will not use your Personal Information for any other purpose without your consent. However, if you choose not to provide us with your Personal Information or wish to withdraw your consent for continued use of your Personal Information, we may not be able to provide you with the services you requested.

How we may use your Personal Information	Can you limit this usage?	Consent
For our everyday business purposes – such as to open and maintain your account, process your requests and transactions, provide Client service, and comply with legal and regulatory obligations.	No	Implicit
For our direct marketing purposes – To inform you about our products and services that may be of interest to you (please see below to limit the ways in which we contact you)	Yes	Explicit
Respond to your employment inquiries and applications – To evaluate your qualifications and complete required background and reference checks when you apply for an open position at EQL-X.	No	Implicit

All financial companies need to share Client's Personal Information to run their everyday business, due to this EQL-X is likely to disclose your Personal Information to our Affiliates located outside of the United Kingdom. We also use cloud data storage providers, which means your Personal Information may be stored on servers that may be located overseas. We will not disclose your Personal Information to overseas recipients without your consent unless we have taken reasonable steps to ensure that the recipient does not breach the Data Protection Act or the recipient is subject to a similar information privacy regime. In the table below, we list the ways in which EQL-X may share your Personal Information.

How we may share your Personal Information	Can you limit this usage?	Consent
For our everyday business purposes – such as to process your requests and transactions, maintain your account(s), comply with legal and regulatory obligations, or request information from credit bureaus. This would include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.	No	Implicit
For our marketing purposes – With service providers that we use to offer our products and services to you (please see below to limit the ways in which we contact you)	Yes	Explicit

EQL-X is a trading name of ACM Group PLC

6th Floor, 154-160 Fleet Street, London, EC4A 2DQ, United Kingdom

Phone: +44(0)2070784822 | Email: clientservices@eqlx.io | Web: www.eqlx.io

Authorised & Regulated by the Financial Conduct Authority – Register No. 441689. Registered in England & Wales No. 5196460

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For our Affiliate's everyday business purposes – Such as to process your transactions, maintain your account(s), comply with legal obligations, or request information from credit bureaus.	No	Implicit
For our Affiliates to market you	Yes	Explicit

How can I limit what is shared or opt out of promotional communications?

To limit our usage or sharing of your Personal Information, please contact EQL-X to change your preferences. Please note, you may continue to receive marketing information in regular account mailings and statements. You may also be contacted to service your account or participate in surveys. If you have an assigned client manager or team, they may continue to contact you to assist you in managing your portfolio or account relationship. You may 'opt out' of receiving any promotional communications either by choosing to opt out where such option is made available in emails you receive from us, or at any time by sending an email to support@eqlx.io. Please allow seven (7) days for your request to be processed.

What happens when I limit sharing or usage of an account that I hold jointly with someone else?

Your preferences for sharing and usage of your Personal Information will apply individually unless you tell us otherwise. Any account holder may express a privacy preference on behalf of the other joint account holder(s).

How do I access and update my Personal Information?

In order to provide high quality Client service, it is essential for you to provide EQL-X with accurate and complete Personal Information and inform us of any changes in a timely manner. We will periodically ask you to review and update your Personal Information, but you may request access to and/or update your Personal Information at any time by contacting EQL-X. Please note if EQL-X is unable to verify the accuracy of the information, EQL-X may be unable to make such updates/changes to your Personal Information as requested by you. If you wish to get access to your Personal Information, please write to us. We are entitled by law to charge a fee of £10 to meet our costs in providing you with details of the information we hold about you.

How long does EQL-X keep Personal Information?

EQL-X keeps your Personal Information on file. If you wish to have your Personal Information removed, please contact EQL-X. We are required to keep some Personal Information for a minimum period of time to meet our regulatory requirements. When EQL-X is no longer required to keep your Personal Information, it is either securely destroyed or made anonymous.

What does EQL-X do to protect my Personal Information?

EQL-X has implemented multiple physical, electronic and procedural safeguards in compliance with applicable laws and regulators to guard your Personal Information from unauthorized access, alteration, or premature destruction.

Does EQL-X use Cookies or other tracking technology?

One of the ways that EQL-X gathers information about visits to its website and Customers use of the applications is through cookies. Cookies are electronic files recorded by your browser that retain information about your website visits on your computer. Cookies are used to:

- record information on visits and use of our websites;
- administer and improve our websites;
- distinguish you from other users of our sites to help facilitate your navigation within our site, and
- identify your preferences to enhance your next visit or tailor advertisements to your interests.

EQL-X does not use cookies to store or transmit any Personal Information without your explicit consent. EQL-X uses three categories of cookies:

- **Marketing** – these cookies use your activity on our websites to make online content and advertising more relevant to your interest.

Type of Cookie	Source of Cookie	Function
Google, Autopilot	Third Party	Tracks users through site

- **Behavioural and analytical** – these cookies help EQL-X provide you with a better experience by learning how you use our website. These cookies help us tailor site content to your personal preferences and past behaviour, or remember your saved settings.

Type of Cookie	Source of Cookie	Function
Google Analytics	Third Party	Tracks users browsing activity

In addition, cookies help manage and monitor internet traffic from third-party websites to ours as well as which areas of our websites are used most often and for how long. EQL-X may provide this type of aggregate information to non-affiliated application service providers that compile statistical or other information for us. This feedback and analysis allows us to continually update our websites. You can block cookies by changing the settings on your internet browser or through the use of software programs specifically designed to block cookies. You should be aware that by blocking cookies or using certain security software settings that these actions may prevent you from logging into your accounts or limit your online activities.

Does this policy apply to third party websites?

We may partner with reputable third party companies that help provide additional products and services or information to you online. These third parties are always subject to a detailed evaluation process to review their relevant business practices however they may have different online disclosures, including security and privacy practices than Alpha. Be sure to review their respective disclosures and policies.

Disclaimer

The services offered by Alpha operate 'AS-IS' and 'AS-AVAILABLE,' without liability to Alpha of any kind. We are not responsible for events beyond our direct control. Because of the complex and constantly changing nature of our technology and business, we cannot guarantee nor do we represent that there will be error-free performance regarding the privacy of your Personal Information, and we will not be liable for any indirect, incidental, consequential or punitive damages relating to the use or release of Personal Information.

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