VERSION 1.0 · EFFECTIVE 1 NOVEMBER 2026

Privacy Policy

How we collect, use and protect your personal data.
Discreetly, and within the law.

Vesper Securities Limited · International Business Company · Saint Lucia · Company No. 2026-00738
Unit 1, La Place Creole Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia

VESPER
SECURITIES

Margin trading involves a high level of risk and is not suitable for all investors. You should carefully consider your objectives, financial situation, needs and level of experience before entering into any margined transactions with Vesper Securities, and seek independent advice if necessary. Forex and CFDs are highly leveraged products, which means both gains and losses are magnified.

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If anything in this policy is unclear, *speak with our team.* We will give you a clear answer.

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BEFORE YOU BEGIN

About this policy

This Privacy Policy explains how Vesper Securities Limited collects, uses, shares and protects your personal data, and the rights you have over it. It applies to every person whose personal data we handle in connection with our Services.

Who we are. Vesper Securities Limited ("Vesper", "we", "us", "our") is an International Business Company incorporated in Saint Lucia under the International Business Companies Act, Cap. 12.14, company number 2026-00738. Our registered office is Unit 1, La Place Creole Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia. We are the data controller of the personal data described in this policy.

Whom it covers. This policy applies to applicants, clients and former clients; directors, shareholders, beneficial owners and Authorised Persons of corporate clients; Introducing Brokers and their personnel; and visitors to our Website, Client Portal and Trading Platform.

The law we follow. We handle personal data in accordance with the Data Protection Act, Cap. 6.07 of the Revised Laws of Saint Lucia, and any other data protection law that applies to you. Where the law of your country gives you greater protection, we apply that protection to your personal data.

How it fits with your Client Agreement. This policy forms part of our Client Agreement. Capitalised terms not defined here have the meanings given in the Client Agreement.

Contact us. Questions about this policy, or requests to exercise your rights, should go to our privacy team at privacy@vespersecurities.com. We will answer you directly.

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What we collect and why

1 Personal data we collect

1.1 We collect only the personal data we need to provide our Services, meet our legal obligations and run our business. The categories are:

CATEGORY	EXAMPLES
Identity	Full name, date of birth, nationality, passport or identity card details and images, photographs, and video and images from liveness checks
Contact	Residential address, email address, telephone number
Financial	Employment, income, net worth, source of funds and wealth, bank account and payment card details, Cryptoasset wallet addresses, tax residence and tax identification number
Knowledge and experience	Trading experience, education, and your answers to our assessment questions
Account and trading	Account numbers, deposits, withdrawals, Orders, positions, Confirmations, statements and Server Log-File records
Technical	IP address, device identifiers, browser and operating system, login times, approximate location, platform usage, and cookie data
Communications	Recordings of calls, chat transcripts, emails and complaints
Due diligence	Politically Exposed Person status, and sanctions, adverse media and fraud screening results
Corporate clients	Details of directors, shareholders, beneficial owners and Authorised Persons, and corporate documents
Preferences	Marketing consents and communication preferences

1.2 Some of this data is sensitive personal data, including biometric data used to match your face to your identity document and information about criminal offences revealed by screening. We process it only where the law permits, and only to verify your identity and prevent financial crime.

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1.3 If you do not provide personal data we need, we may be unable to open or maintain your Account.

1.4 If you give us personal data about another person, such as a director, beneficial owner or Authorised Person, you confirm that you are entitled to do so and that you have told them about this policy.

2 How we collect it

2.1 We collect personal data directly from you, through your Application, the Client Portal, the Trading Platform and your calls, chats and emails with our team.

2.2 We collect technical data automatically when you use our Website, Client Portal and Trading Platform.

2.3 We collect personal data from third parties, including identity verification providers; sanctions, Politically Exposed Person and adverse media databases; fraud prevention agencies; banks and payment service providers; the Introducing Broker who referred you; and public sources such as company registries.

3 How we use it

3.1 We use personal data only for the purposes below, each supported by a legal ground.

PURPOSE	LEGAL GROUND
Assess your Application, verify your identity, and open and administer your Account	Performance of our contract with you; legal obligation
Execute Orders, provide the Trading Platform, and issue Confirmations and statements	Performance of our contract with you
Process deposits and withdrawals and hold Client Money	Performance of our contract with you; legal obligation
Prevent money laundering, terrorist financing, sanctions breaches and fraud	Legal obligation; legitimate interests
Report to tax authorities, including under the Common Reporting Standard and FATCA	Legal obligation
Monitor trading for Market Abuse and Prohibited Conduct	Legal obligation; legitimate interests

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PURPOSE	LEGAL GROUND
Record calls and communications	Legal obligation; legitimate interests
Handle complaints, disputes and legal claims	Legitimate interests; legal obligation
Secure our systems and prevent unauthorised access to your Account	Legitimate interests
Improve our Services through analysis of how they are used	Legitimate interests
Pay Introducing Brokers and track referrals	Legitimate interests
Send you information about our products and services	Consent, or legitimate interests where the law permits
Respond to Regulators, courts and law enforcement	Legal obligation

3.2 We rely on legitimate interests only where your interests and rights do not override them. You may ask us for details of the balance we have struck.

3.3 We will not use your personal data for a new purpose unrelated to those above without telling you first and, where the law requires, obtaining your consent.

4 Marketing, cookies and automated decisions

4.1 We send marketing only where you have agreed to receive it or the law otherwise permits. You may withdraw at any time by using the unsubscribe link, changing your preferences in the Client Portal or contacting us. We will continue to send messages about your Account and our Services.

4.2 We do not sell your personal data.

4.3 Our Website and Client Portal use cookies and similar technologies. Essential cookies keep our Services secure and working. We use analytics and functional cookies only with your consent, which you can give or withdraw through our cookie settings.

4.4 We use automated tools to verify identity, screen for sanctions and fraud, and apply the risk controls in our Client Agreement, such as stop out. If a decision made solely by automated means significantly affects you, such as declining your Application, you may ask for it to be reviewed by a member of our team.

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Sharing, transfers, retention and security

5 Who we share it with

5.1 We share personal data only as needed for the purposes in clause 3, with:

(a) our Affiliates;

(b) service providers acting on our instructions, including providers of information technology, cloud hosting, the Trading Platform, identity verification and screening, payment processing and client communications;

(c) Liquidity Providers, banks and payment service providers, to execute Transactions and process payments;

(d) the Introducing Broker who referred you, limited to your Account status and the trading activity needed to calculate its remuneration;

(e) our auditors, insurers and professional advisers;

(f) Regulators, tax authorities, courts, law enforcement and fraud prevention agencies, where the law requires or permits;

(g) a prospective buyer of, or successor to, all or part of our business, under a duty of confidentiality; and

(h) any other person you authorise.

5.2 Our service providers may use personal data only on our instructions. They must keep it confidential and protect it to a standard no lower than ours.

6 International transfers

6.1 We, our Affiliates and our service providers operate in several countries. Your personal data may be transferred to, and stored in, countries outside your own and outside Saint Lucia, which may not offer equivalent protection.

6.2 When we transfer personal data, we protect it by one or more of the following: transferring it to a country recognised as providing adequate protection; contractual terms that require the recipient to protect it to the standard of this policy, such as standard contractual clauses; or another safeguard the law permits.

6.3 You may ask us for details of the safeguards that apply to your personal data.

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7 How long we keep it

7.1 We keep personal data for as long as we need it for the purposes in clause 3, and then for the periods below.

RECORD	HOW LONG WE KEEP IT
Account opening, identity and due diligence records	Seven (7) years after your Account closes
Transaction records, Confirmations, statements and Server Log-File records	Seven (7) years after the Transaction
Recordings of calls and other communications	Seven (7) years after the recording
Complaints and dispute records	Seven (7) years after resolution
Applications we decline or that are not completed	Two (2) years after the Application
Marketing preferences	Until you withdraw consent; we then keep a record so that we do not contact you again
Technical and cookie data	Up to 13 months

7.2 We may keep personal data for longer where the law, a Regulator or a court requires it, or where it is needed for an actual or potential legal claim or investigation.

7.3 At the end of the retention period, we securely delete or anonymise the personal data.

8 How we protect it

8.1 We protect personal data with technical and organisational measures appropriate to the risk, including encryption in transit and at rest, multi-factor authentication, access restricted to staff who need it, activity logging, confidentiality obligations and training for our staff, due diligence on service providers, and regular testing of our systems.

8.2 No system is completely secure. You can help by keeping your Access Data confidential, as the Client Agreement requires, and telling us immediately if you suspect it has been compromised.

8.3 If a personal data breach is likely to cause you significant harm, we will notify you and any authority the law requires without undue delay.

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Your rights and choices

9 Your rights

9.1 Subject to the law that applies to you, you have the right to:

(a) access the personal data we hold about you and receive a copy;

(b) have inaccurate or incomplete personal data corrected;

(c) have personal data erased where we no longer need it or have no legal ground to keep it;

(d) restrict how we use your personal data while a concern is resolved;

(e) object to our use of your personal data based on legitimate interests, and to direct marketing at any time;

(f) receive personal data you gave us in a structured, machine-readable format and have it sent to another organisation, where we process it by automated means on the basis of our contract or your consent;

(g) withdraw your consent at any time, without affecting processing that took place before; and

(h) ask for a decision made solely by automated means to be reviewed by our team, as described in clause 4.4.

9.2 Some rights are limited by our legal obligations. For example, we must keep Account and Transaction records for the periods in clause 7, so we cannot erase them before those periods end. If we cannot do what you ask, we will explain why.

10 How to exercise your rights

10.1 You may exercise your rights by emailing privacy@vespersecurities.com or through the Client Portal.

10.2 We may ask you to verify your identity before we act on your request.

10.3 We will respond within 30 days. If your request is complex, or you have made several, we may extend this by up to a further 60 days. If we do, we will tell you why within the first 30 days.

10.4 We do not charge a fee, unless a request is clearly unfounded or excessive. In that case we may charge a reasonable fee or decline the request.

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11 Complaints

11.1 If you are concerned about how we handle your personal data, please contact our privacy team first. You may also complain under our Complaints Procedure at support@vespersecurities.com.

11.2 You may also complain to the Data Protection Commissioner of Saint Lucia, or to the data protection authority in the country where you live or work.

12 Other matters

12.1 Our Services are not intended for anyone under 18. We do not knowingly collect personal data from children. If we learn that we have, we will delete it.

12.2 Our Website may link to third-party websites. We are not responsible for their privacy practices, and you should read their policies.

12.3 We may update this policy. We will notify you of material changes by email or through the Client Portal at least 10 Business Days before they take effect. The current version is always available on our Website.

Questions about your personal data? *Speak with our team.*

Privacy: privacy@vespersecurities.com
Complaints: support@vespersecurities.com

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