

# ADE Bahamas Ltd. General Privacy Policy

## Contents

ADE Bahamas Ltd. General Privacy Policy.....	1
1. About this Policy .....	1
2. Who this Policy applies to? .....	1
3. Personal information collected.....	2
4. Collection of Data.....	3
5. Use of data .....	3
6. Data disclosure and Purpose.....	8
7. International data transfers .....	8
8. Data sourcing and Purpose .....	9
9. Your rights.....	9
10. Automated Decisions .....	10
11. Data security .....	10
12. Data retention.....	10
13. Cookies.....	10
14. Children's data .....	10
15. ADE as a processor or a service provider.....	10
16. Updates to this Policy .....	11

### 1. About this Policy

ADEX Holdings Ltd and its subsidiaries and affiliates (collectively known as 'ADE Holdings', 'ADE', 'we' and 'us') are committed to safeguarding your personal information. ADE is the controller or processor of your personal information according to the privacy laws and regulations applicable to us. *See section 15 below for details on how you can contact us.*

The purpose of this privacy policy ('Policy') is to explain how we process your personal information so that you understand what we collect, what we do with it, who we share it with, and the rights available to you. The processing we undertake may include collecting, storing, modifying, accessing, or destroying personal information and may be completed manually or through automatic means.

Personal information (also referred to as 'personal data' or 'data') means any information that can be used to identify you and your device. This includes direct identifiers, such as your name and contact details and indirect identifiers, such as data that we may collect from the electronic device you use to access our services.

*If you have any questions about this Policy or how we use your data, our details are provided in the 'Contact details' section below.*

### 2. Who this Policy applies to?

This Policy applies to you if you have any of the following relationships with us:

- Corporate Representative – you are a representative of any of our corporate customers (e.g. an employee or a director)
- Service User – you use any of our platforms or services

- Web Visitor – you visit our website at [www.adebsx.com](http://www.adebsx.com), any of our social media pages, or you interact with us via any third-party websites (e.g. comment on any of our blogs or posts published on a third-party website)
- Subscriber – you subscribe to receive communications from ADEX Holdings
- Purchaser – you purchase anything from us
- Communicator – you contact us either online, by telephone, post or any other method
- Supplier – you provide services to us or are employed by a company that provides services to us
- Third-party customer – you are a customer of a third party, and we have a relationship with that third party
- Shareholders – you hold a direct or indirect equitable interest in the ADEX Holdings.

### 3. Personal information collected

Depending on the nature of the relationship you have with us, where you are located, and the products and services you utilise, we may collect and otherwise process the following personal information, including sensitive personal information in some cases about you:

- i. Account preferences and analytics  
Information regarding your stated preferences and relating to your use of our services.
- ii. Audio, electronic, visual, or similar information  
Information includes workplace photographs, recruitment events, or CCTV footage.
- iii. Authentication details  
Your credentials which you use to access our services, including your user ID, password, and memorable information.
- iv. Communication records  
Records of any communications between you and us, including via email, our website (e.g. through our 'Send us feedback form'), telephone, social media and letter.
- v. Contact details  
Your name, title, home address, office address, company name and type, job role, email address, telephone number and mobile number.
- vi. Device and electronic information  
Details we collect from your devices when you access our services include your IP address, cookies, activity logs related to interactions with our systems, online identifiers, device type, operating system, browser, unique device identifiers, and geo-location data.
- vii. Service usage  
When you are operating our services (e.g. one of our software applications), we will collect records of your usage, including transactions that you undertake, information that you select, logs of when you access the services and for how long, details of any failed login attempts and any information that you choose to download.
- viii. Identification information  
Information that is used to verify your identity includes: national insurance number (UK only), social security number, Taxpayer Identification Number, personal identification number (Sweden only), date of birth, place of birth, passport, driver's license, and proof of address.
- ix. Financial information  
Credit/debit card details.

- x. Financial status  
Information used to determine your creditworthiness, such as your credit rating, bank statements and tax information.
- xi. Product and service preferences  
Product update preferences, market activities reports, trading and technology communications, clearing and market regulation advisories, and economic report subscriptions.
- xii. Professional information  
Your job role/title, function and details of the organisation you work for.
- xiii. Social network information  
Social media account information and personal information collected from social media accounts.
- xiv. Website posts  
Posts, comments or other information you submit on any public forums on our website including message boards and chat rooms.

In addition, we may also collect the following categories of personal data about you, in very limited cases and in compliance with applicable laws, that may be of a sensitive nature:

- xv. Biometric data  
Fingerprint data is captured for Financial Industry Regulatory Authority (FINRA) and Data Centre Security purposes and in certain situations when allowing access to individuals to our premises.
- xvi. Criminal convictions  
Information relating to any criminal record that you may have, including suspicions, offences and convictions.

#### 4. Collection of Data

In addition to any personal information that you provide to us directly, we may also collect and derive data about you through the following means:

- Cookies and similar technologies – when you visit our website or use any of our mobile applications, we may employ cookies and similar technologies. See section 12 below for further details.
- Monitoring of platforms and services – if you use any of our platforms (e.g. ADE WebApp) then we may collect data on your usage of these.
- Third party sources – other organisations may provide us with access to certain data, as further detailed in section 8 below.
- Data analytics – we may infer or derive certain data about you through our analytical processes, which are further explained in section 5 below.

Please see section 8 'Who we may receive your data from and why' for further information on the types of third parties from which we may receive your personal information.

#### 5. Use of data

Depending on the nature of the relationship that we have with you and where you are located, the purposes for which we may use your data are as follows:

- Processing any application (made via online forms or agreements) you make to become an individual member of ADE
- Verifying your identity
- Performing Know Your Customer (KYC) or Anti-Money Laundering (AML) reviews
- Assessing your creditworthiness
- Providing you with customer services and assistance relating to our services

- Communicating with you in relation to any services that we provide to you
- Monitoring of how you use any service you have with us and our services
- Assisting you with managing any account you have with us
- Conduct profiling based on your interactions with us to identify individuals most interested in our products and services
- Sending you newsletters and marketing materials, if you have chosen to subscribe to receive them and otherwise advertising our products and services.
- Personalising our services
- Improving our products and services
- Registering your attendance at our events and conferences
- Administration of our business
- Compliance with laws that are applicable to us
- Defending ourselves and bringing claims in relation to legal proceedings
- Safeguarding our environments
- Assisting with training our staff and our customers
- Shareholder services
- Security and protecting our systems

In service provision, some personal information is necessary so ADE can provide you with access to ADE platforms, information or products. ADE also requires personal information to authenticate you so that we know it is you and not someone else. Should you choose not to provide the necessary personal information, we may be unable to facilitate your services or access. You may choose to opt in or opt out of receiving marketing communication at any time.

Should you be located in the People's Republic of China ("PRC", for the purpose of this Policy, excluding the Hong Kong SAR, the Macau SAR and Taiwan), we process your personal information based on a lawful basis permitted under Chinese data privacy laws (and not based on legitimate interests).

We are committed to only using your personal data to the extent relevant, necessary and permitted by applicable local laws. Further information about the purposes for which we may use your data, the categories of personal information relevant to each purpose and the lawful basis we rely upon in the EU and elsewhere (as applicable) are outlined below. We have also clarified under what circumstances this processing activity is likely to be performed, with reference to your relationship with us.

PROCESSING PURPOSE	CATEGORIES OF DATA & TYPE OF RELATIONSHIP WITH US	LEGAL BASIS FOR PROCESSING (RELEVANT JURISDICTIONS ONLY)
<p><b>Membership applications</b></p> <p>Setting up your account with us and becoming an ADE member</p> <p>Creating your profile</p> <p>Taking all other necessary steps to make your chosen products/services available to you</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Professional information</p> <p>Authentication details</p> <p>Financial information</p> <p>Identification information</p> <p>Criminal convictions</p> <p><b>Relationship type</b></p> <p>Corporate Representative</p> <p>Service User</p>	<p>Necessary for the performance of the contract between you and us</p> <p>Legal obligation</p> <p>Consent</p>
<p><b>Verifying your identity</b></p> <p>Using the information you provided us to verify your identity for setting up your account and creating your profile.</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Identification information</p>	<p>Necessary for the performance of the contract between you and us</p> <p>Our legitimate business interest in ensuring that we are correctly provisioning access and services</p>

<p>Authenticate your use of our services (e.g. ensuring you have provided us with the correct username and password to login to your account)</p>	<p>Authentication details</p> <p><b>Relationship type</b></p> <p>Corporate Representative</p>	
<p><b>Know your client checks.</b></p> <p>Performing credit checks to determine your financial status if you apply for a membership with us</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Financial status</p> <p>Professional information</p> <p>Criminal convictions</p> <p><b>Relationship type</b></p> <p>Corporate Representative, Credit Reporting Bodies</p>	<p>Necessary for the performance of the contract between you and us</p> <p>Legal Obligation</p>
<p><b>Customer services</b></p> <p>Provide you with assistance with access to and use of our products and services both online and via telephone [for example, account access services]</p> <p>Review and respond to any queries, issues and complaints you may have</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Professional information</p> <p>Authentication details</p> <p>Communication records</p> <p>Website posts</p> <p><b>Relationship type</b></p> <p>Corporate Representative, Service User, Web Visitor</p>	<p>Necessary for the performance of the contract between you and us</p> <p>Our legitimate business interest to aid our customers with their accounts and questions.</p>
<p><b>Communicating with you</b></p> <p>Inform you about important details relating to your account</p> <p>Provide you with notifications and alerts relating to your account, such as service announcements and details of maintenance or other disruptions.</p> <p>Communicate with you as necessary to administer our relationship with you</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Professional information</p> <p>Communication records</p> <p>Website posts</p> <p>Updates to offerings you have registered for</p> <p>Device and electronic data</p> <p><b>Relationship type</b></p> <p>Corporate Representative, Service User, Purchaser, Supplier, Third Party Customer, Contributor, Scholarship Candidate</p>	<p>Necessary for the performance of the contract between you and us</p> <p>Our legitimate business interest to communicate with you about your account</p>
<p><b>Managing your account</b></p> <p>Provide you with access to your account information</p> <p>Maintain the security of your account.</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Authentication details</p> <p>Communication records</p> <p><b>Relationship type</b></p> <p>Service User</p>	<p>Necessary for the performance of the contract between you and us</p> <p>Our legitimate business interest, to keep your account secure and provide you with information regarding your account.</p>
<p><b>Marketing purposes</b></p> <p>Contacting you by email, phone, text or post (as applicable) about services, events, industries, product</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Device and electronic information</p>	<p>Consent</p>

<p>announcements and other marketing communications if you have agreed to receive this information</p>	<p>Product and service preferences  Communication record  Account preferences and analytics  Internet or other electronic network activity information  Professional information  Service usage  Social network information</p> <p><b>Relationship type</b>  Corporate Representative, Service User, Subscriber</p>	
<p><b>Personalising our services</b></p> <p>Sending news and product-related updates to customers based on account preferences.</p>	<p><b>Categories of data</b></p> <p>Account preferences and analytics  Device and electronic information  Product and service preferences  Contact details  Professional information  Service usage</p> <p><b>Relationship type</b>  Corporate Representative, Service User, Subscriber</p>	<p>Our legitimate interest in the administration of the Site, improving our services and statistical purposes</p> <p>Consent</p>
<p><b>Improving our products and services</b></p> <p>Undertaking market research and satisfaction surveys to help us understand how our products/services can be improved</p> <p>Analyse how you use our services to evaluate how we can improve them and assess our systems' performance.</p>	<p><b>Categories of data</b></p> <p>Account preferences and analytics  Contact details  Communication records  Product and service preferences  Device and electronic information  Service usage</p> <p><b>Relationship type</b>  Service Users, Web Visitors</p>	<p>Our legitimate business interest is to improve our products and services to meet our customers' and clients' needs.</p>
<p><b>Events</b></p> <p>Inviting you to our events and conferences</p> <p>Registration for attendance and personal requirements, depending upon event capabilities.</p>	<p><b>Categories of data</b></p> <p>Contact details  Professional information  Communication records  Account information</p> <p><b>Relationship type</b>  Corporate Representatives, Service User, Subscriber, Event coordinators, Event sponsors</p>	<p>Consent</p> <p>Performance of a contract</p>
<p><b>Colleague training</b></p> <p>Use recordings of communications with you (e.g. telephone calls) to provide staff training and improve the quality of our customer services.</p>	<p><b>Categories of data</b></p> <p>Communication records  Contact details  Authentication details</p> <p><b>Relationship type</b>  Corporate Representatives, Service Users</p>	<p>Our legitimate business interest, which is to train our colleagues to ensure that they provide the highest quality services to you</p>

<p><b>Administration of our business</b></p> <p>Transfers to prospective or actual buyers of an interest in our business</p> <p>Receipt of professional services (e.g. legal advice and accountancy advice)</p> <p>Financial management, such as internal audits</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Communication records</p> <p>Financial records</p> <p><b>Relationship type</b></p> <p>Corporate Representatives, Professional services</p>	<p>Necessary for compliance with our legal obligations</p> <p>Performance of a contract</p>
<p><b>Compliance with laws applicable to us</b></p> <p>To cooperate fully with state, local, federal, and international legal, governmental and regulatory entities, authorities and officials in any investigation or governmental, legal or regulatory proceeding relating to any information collected or to any purported unlawful activities.</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Communication records</p> <p><b>Relationship type</b></p> <p>Government and law enforcement agencies.</p>	<p>Necessary for compliance with our legal obligations</p> <p>Our legitimate business interest to cooperate with applicable laws and regulations</p>
<p><b>Legal proceedings and actions</b></p> <p>Defence against legal claims</p> <p>Enforcement of our legal rights</p> <p>Notification of law enforcement regarding alleged or potential criminal activities</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Communication records</p> <p><b>Relationship type</b></p> <p>Law enforcement agencies, Legal Counsel</p>	<p>Necessary for compliance with our legal obligations</p> <p>Our legitimate business interest to facilitate legal proceedings</p>
<p><b>Safeguarding our environments</b></p> <p>Safeguarding the use of our services to prevent malicious behaviour through the monitoring of the use of our services</p> <p>Ensuring that there is no unauthorised access to ADE offices</p>	<p><b>Categories of data</b></p> <p>Device and electronic information</p> <p>Service usage</p> <p>Contact details</p> <p><b>Relationship type</b></p> <p>Service Users, Web Visitors</p>	<p>Necessary for compliance with our legal obligations</p> <p>Our legitimate interest of ensuring the security, integrity and availability of our systems and your account</p>
<p><b>Detecting potential market abuses</b></p> <p>Detecting any actions or behaviours that take place using our services which may breach ADE's rules or constitute a criminal offence (e.g., fraud, money laundering, market abuse).</p>	<p><b>Categories of data</b></p> <p>Device and electronic information</p> <p>Service usage</p> <p>Trading history</p> <p>Contact information</p> <p><b>Relationship type</b></p> <p>Service Users, Web Visitors, Law enforcement agencies, Legal Counsel</p>	<p>Necessary for compliance with our legal obligations</p>
<p><b>Administration of our political action committee</b></p> <p>Process contributions made via the political action committee</p>	<p><b>Categories of data</b></p> <p>Contact details</p> <p>Payment information</p> <p>Professional information</p> <p><b>Relationship type</b></p> <p>Contributor, Corporate representative</p>	<p>Consent</p>
<p><b>To assess scholarship applications</b></p>	<p><b>Categories of data</b></p>	<p>Consent</p>

Process candidates on their applicability for scholarship opportunities.

Contact information

Scholarship application

**Relationship type**

Corporate representative

## 6. Data disclosure and Purpose

We may disclose your data to ADE Holdings entities, service providers or other third parties for various purposes, to achieve our business objectives, and/or to comply with applicable laws. We have agreements in place with these external third parties who process your personal data to ensure their compliance with the applicable data protection laws.

We may disclose your personal information to the following parties to achieve our own purposes and not for money or other valuable considerations:

**ADE Holdings**– As needed, facilitate our operations business, services and products.

**IT suppliers** – including hosting providers, service providers and telecommunications providers to manage our business and support our environment and operations.

**Marketing providers** – who may, through the course of their professional services to ADE, be required to have access to ADE services for providing required system services, i.e. hosting services, database marketing, and customer analytics.

**Credit reference agencies** – to check your creditworthiness concerning your credit score and financial status for us undertaking 'KYC' checks if you apply for membership with us.

**Third-party payment providers** – to process payments when you purchase products or services from us.

**Regulators and authorities** – As a global company, ADE Holdings is internationally subject to several financial and information regulators. ADE Holdings is also based in several jurisdictions and subject to those applicable laws. ADE Holdings will, therefore, as permitted by applicable laws, share information with these parties to cooperate fully with state, local, federal, and international legal, governmental and regulatory entities, authorities and officials in any investigation or governmental, legal or regulatory proceeding relating to any information collected or to any purported unlawful activities.

**Professional advisors** – including accountants, financial advisors, lawyers and other professional advisors to support auditing, compliance and corporate governance functions.

**Law enforcement agencies** – concerning detecting and preventing criminal activities, as permitted by applicable laws.

**Prospective purchasers and assignees** – if our business, or part of it, may be sold or reorganised.

We may also share de-identified or aggregated information with anyone and for any purpose. To receive more information about the service providers or third parties to which we may disclose your data, you can contact us through the information provided in the 'Contact details' section below.

## 7. International data transfers

As applicable laws permit, we may process information collected from or about you in any country where ADE Holdings operates.

In some cases, your information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for information under applicable laws (such as those in the European Union). When we conduct such transfers, we rely on your explicit consent (as required under applicable laws) and/or put in place appropriate safeguards (including, without limitation, signing standard contractual clauses) under applicable legal requirements.

Information located outside of your home country may be subject to access by that country's government or its agencies under a lawful order, as permitted by applicable laws.

We put in place appropriate procedures and safeguards following applicable legal requirements when conducting such transfers. For more information on the appropriate safeguards in place or to obtain a copy, please get in touch with us through the information provided in the 'Contact details' section below.

People's Republic of China ("PRC"):

All data, including personal information, as defined under the Personal Information Protection Law of PRC, provided to us by you will be used, distributed, and maintained per this Policy, which forms a part of the contractual terms you agree to. Should you provide us with this data as an institution, you confirm that you have obtained all the necessary consents from the relevant data subjects concerned and that your processing, use and transfer of data to us complies with all applicable PRC data privacy laws. If you, as a natural person, provide us with your personal information, you expressly consent to any processing, use or transfer of such data. In each data transfer above, you acknowledge and agree that the data may be transferred outside of the territory of the PRC.

## 8. Data sourcing and Purpose

We may receive certain data about you from various third parties from time to time, including:

**ADE Holdings** – as needed to facilitate our business operations, services and products.

**Our corporate customers** – we may receive information directly from our customers (e.g. the company that you represent)

**Third-party agencies** – who may provide us with information that they have collected from you on our behalf (e.g. companies that perform background checks on behalf of ADE)

**Social media platforms** – including publicly available information sources from social media pages or services provided via social media platforms (e.g. LinkedIn, WeChat, Weibo, Facebook, X (formally Twitter), etc.)

**Third parties that you have a relationship with** – if you are a customer of a third party and we have a relationship with that third party, we may receive information from them.

**Publicly available government and non-government data** – information about you that is available from the government or otherwise publicly available.

## 9. Your rights

You may have the following rights regarding your personal information subject to local law. These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted by applicable law.

**Access/Know** – request a copy of your personal information and information relating to how it is processed

**Rectify/Correct** – request any inaccuracies in the personal information we hold about you be corrected.

**Erasure/Deletion** – request that we erase your personal information from our records

**Restrict** – request that we no longer process your data

**Object** – object to specific ways that we process your personal information

**Transfer** – request that your personal information be disclosed to a third party

**Withdraw your consent** – where we are relying on your consent to process your personal information, then you can withdraw your consent at any time

**File a complaint** – you may be entitled to file a complaint with your local data protection authority.

If you reside in France, you also have the right to instruct us about the fate of your personal information after your death.

### **Submitting Requests**

To exercise your rights to know, access, correct, delete, restrict, object, or portability under applicable local law, or if you are an authorised agent seeking to exercise rights on behalf of a consumer under applicable local law, please get in touch with us on the details set out in the 'Contact details' section of this Policy below. You may also exercise these rights via our Cookie Preference Centre.

Please note that some of your rights are not absolute, and there may be certain circumstances where we cannot fulfil a request that you have made. In some circumstances, we may also require that you provide additional personal information to confirm your identity.

### 10. Automated Decisions

Automated decision-making occurs when an electronic system uses personal data to decide without human intervention.

ADE may use automated analytics to identify individuals who would be most interested in our product, which may result in individuals being contacted about ADE products or services.

### 11. Data security

We use technical, administrative, and physical security safeguards and other reasonable security measures to protect the information we collect or receive against loss and unauthorised access, modification, or disclosure. Please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable. Moreover, we are not responsible for the security of information you transmit over networks that we do not control, including internet and wireless networks.

### 12. Data retention

ADE Holdings retains personal information for the duration of the business relationship or, where required, following the internal records management and retention policies and regulatory requirements that may apply to us.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

We make reasonable attempts to ensure that all instances of such information (e.g. production, backups, etc.) are deleted in their entirety, including any of your personal information. For requests for access, corrections, or deletion, please see "Contact Us" below.

### 13. Cookies

Please see our Cookies Policy for further information on how we use cookies on our website.

### 14. Children's data

Our website and services are generally not directed at children or individuals under the age of 18. If we obtain actual knowledge that any personal information, we collect has been provided by a child under the age of 13, we will promptly delete that information. If you access our website from the EU/EEA or if you access an EU/EEA website, the age limit will be 16. If you access our website from the PRC or if you access a PRC website (if any), the age limit will be 14.

### 15. ADE as a processor or a service provider

There may be certain circumstances where we process your personal information on behalf of one of our customers and do not use it for our own purposes. For instance, our customer may upload your information to

one of our applications hosted on our servers. In these circumstances, ADE is acting as a processor or service provider in relation to another company that is the controller or business responsible for handling your personal information, as these terms are used in applicable data protection laws. This privacy policy will not apply to ADE as a processor or service provider. Instead, it would be best to refer to the organisation's privacy policy that provides us with your personal information.

The above does not apply to ADE Holdings under the applicable PRC data privacy laws, where no distinction between "data controller" and "data processor" is made. However, it would be best if you still referred to the organisation's privacy policy that provides us with your personal information, where we would be deemed a third-party data processor.

## 16. Updates to this Policy

We may update this Policy from time to time. For instance, there may be changes in the data we collect about you or the purposes we use it.

Whenever there are significant changes to the Policy then we will notify you of these.

### 1. Contact details

If you have any comments, questions or concerns about how we process your data, please get in touch with Privacy Compliance at [Privacy@adebsx.com](mailto:Privacy@adebsx.com).

Bayside Executive Park No. 3 West Bay Street & Blake Road, Nassau, Bahamas

P.O. Box CB-13012

For the purposes of data protection in the EU/EEA:

The full list of companies across ADE Holdings and the contact details of each company can be found at [www.alternativederivatives.com/Corporate\\_Structure](http://www.alternativederivatives.com/Corporate_Structure).

ADE Holdings has a designated Data Protection Officer registered for a number of ADE entities. They can be contacted at [Privacy@adebsx.com](mailto:Privacy@adebsx.com)