

PRIVACY POLICY

VG MARKETS LIMITED

How we collect, use, share, secure and retain your personal information

September 2026

VGM-LEG-PP-001 | Version 2.0

PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros

Company No. 16087

Licence No. L16087/VGM — Anjouan Offshore Finance Authority

CONTRACTS FOR DIFFERENCE AND ROLLING SPOT FOREIGN EXCHANGE ARE COMPLEX LEVERAGED INSTRUMENTS THAT CARRY A HIGH RISK OF RAPID LOSS. YOU CAN LOSE ALL OF THE FUNDS YOU DEPOSIT. THESE PRODUCTS ARE NOT SUITABLE FOR EVERY INVESTOR. YOU SHOULD CONSIDER WHETHER YOU UNDERSTAND HOW THEY WORK AND WHETHER YOU CAN AFFORD THE HIGH RISK OF LOSING YOUR MONEY.

VG MARKETS LIMITED | COMPANY NO. 16087 | LICENCE NO. L16087/VGM | ANJOUAN OFFSHORE FINANCE AUTHORITY

Document title	Privacy Policy
Document reference	VGM-LEG-PP-001
Version	2.0 — supersedes Version 1.0 (September 2026)
Issuing entity	VG Markets Limited (Company No. 16087)
Licence	International Brokerage and Clearing House Licence No. L16087/VGM, issued by the Anjouan Offshore Finance Authority under Government Notice No. 005 of 2005
Owner	Head of Compliance
Approved by	Board of Directors
Effective date	1 September 2026
Next scheduled review	31 August 2027
Retention period	Seven (7) years from the end of the client relationship
Classification	Public — published on the Company website

1. INTRODUCTION

VG Markets Limited (“**VG Markets**”, “**we**”, “**us**” or “**our**”) is a company incorporated in the Autonomous Island of Anjouan, Union of Comoros, under Company Number 16087, holding International Brokerage and Clearing House Licence No. L16087/VGM issued by the Anjouan Offshore Finance Authority (the “**Authority**”) under Government Notice No. 005 of 2005. Our registered office is PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros.

This Privacy Policy explains what personal information we collect about you, why we collect it, how we use and share it, how long we keep it, how we protect it, and what you can ask us to do with it. It applies to your use of our website, our mobile applications, our trading platforms and our client portal, and to any other dealings you have with us.

We are the controller of the personal information described in this Policy.

2. THE STANDARDS WE APPLY

The Union of Comoros does not currently have a comprehensive statutory data protection regime comparable to those in a number of other jurisdictions, and there is no data protection supervisory authority to which a complaint about our handling of your personal information may be referred.

We think clients should be told this plainly rather than left to assume a statutory regime applies. It does not change what we do with your information — the protections and rights described below are commitments we make to you and apply as a matter of policy.

As a matter of policy, we handle personal information in accordance with internationally recognised data protection principles. We commit to:

- collecting only the personal information we need for a defined and legitimate purpose;
- using it only for the purposes described in this Policy, or for a compatible purpose;
- keeping it accurate and up to date so far as reasonably practicable;
- retaining it no longer than we need it, subject to our legal and regulatory obligations;
- protecting it with appropriate technical and organisational measures;
- sharing it only as described in this Policy; and
- honouring the rights set out in Section 9 of this Policy.

3. WHAT WE COLLECT

We collect personal information when you enquire about our services, complete an application, open and operate an account, use our platforms, or contact us. The categories are:

Category	Examples
Identity and contact information	Full name, date of birth, nationality, country of residence, residential address, email address, telephone number.
Identification and verification documents	Government-issued identity document or passport, proof of residential address such as a utility bill or bank statement, photographs or video used for identity verification.
Financial and transactional information	Bank account and payment method details, deposit and withdrawal records, trading activity, order and execution records, account statements and balances.
Due diligence information	Employment and occupation, source of funds and source of wealth documentation, tax residency, politically exposed person status, sanctions and adverse media screening results.
Suitability and experience information	Trading knowledge and experience, investment objectives and any information you provide in an assessment or questionnaire.
Technical and usage information	IP address, device type and identifiers, operating system, browser, login times and session duration, pages visited, platform features used, and cookie identifiers (see Section 7).
Communications	Emails, chat and support messages, and recordings or notes of telephone calls with us.

We may also derive information from your use of our services, including patterns of trading activity used for risk management, fraud prevention and transaction monitoring.

We do not seek to collect special categories of personal information, and you should not provide them to us unless we specifically ask.

4. WHY WE USE IT

Purpose	Explanation
Opening and operating your account	Processing your application, verifying your identity, setting up and maintaining your account, executing your Orders and processing payments.
Regulatory and legal compliance	Meeting our obligations under our licence and applicable law, including customer due diligence, ongoing monitoring, sanctions screening, record keeping, and reporting to the Authority or to other competent authorities where required.
Financial crime prevention	Detecting, investigating and preventing money laundering, terrorist financing, fraud, market abuse, account takeover and other financial crime.
Risk management	Monitoring exposure, margin and trading activity, and managing the risks of our business.
Service delivery and support	Responding to your enquiries, handling complaints, and providing technical support.
Communications	Sending you service messages about your account, including margin notifications, statements, platform maintenance and changes to our terms.
Improving our services	Analysing platform performance, improving our systems and cybersecurity, and producing anonymised statistics for internal analysis.
Marketing	Sending you information about products, services and promotions, where you have consented to receive it. You may withdraw that consent at any time.

We do not use automated decision-making that produces legal effects concerning you without human involvement.

5. WHO WE SHARE IT WITH

We do not sell your personal information, and we do not provide it to third parties for their own marketing purposes. We share it only as follows:

- **Regulators and authorities.** The Anjouan Offshore Finance Authority and any other competent authority, court or law enforcement body, where we are required or permitted to do so.
- **Service providers.** Identity verification and screening providers, payment service providers and banks, cloud hosting and technology providers, customer communication tools, and analytics providers. These act on our instructions and are bound by confidentiality and data protection obligations.
- **Professional advisers.** Auditors, legal counsel and compliance consultants engaged in connection with our business.
- **Affiliated entities.** Companies under common ownership with us, where reasonably necessary for account administration, regulatory compliance, fraud prevention, customer support, technology hosting or business operations.
- **Persons acting for you.** A person you have authorised in writing to act on your behalf.
- **In a corporate transaction.** A prospective purchaser or successor in the event of a sale, merger or reorganisation, subject to equivalent confidentiality protections.

Some of these recipients are located outside the Union of Comoros, and the protections applying to personal information vary between jurisdictions. Where we transfer your information internationally, we require the recipient to protect it to a standard consistent with this Policy.

6. HOW LONG WE KEEP IT

We retain client records for a minimum of **seven (7) years** from the end of the client relationship, or from the date of the relevant transaction or communication where that is later. This period exceeds the statutory minimum applicable in the Autonomous Island of Anjouan and is applied consistently across our record-keeping framework.

We may retain information for longer where we are required to do so by law, where it is the subject of an ongoing investigation, complaint or legal proceeding, or where it is needed to establish, exercise or defend a legal claim. When information is no longer needed, it is securely deleted or anonymised.

7. COOKIES AND SIMILAR TECHNOLOGIES

Our website and platforms use cookies and similar technologies to enable core functionality, remember your preferences, measure performance and compile aggregate usage statistics.

Type	Purpose
Essential	Required for the site and platform to work — login sessions, security and load balancing. These cannot be switched off.
Performance	Help us understand how the site is used so we can improve it.
Functional	Remember your settings and preferences, such as language.
Analytics	Compile anonymised statistics about site usage.

You can accept or reject non-essential cookies when you first visit our website, and you can change your choice at any time. You can also block or delete cookies through your browser settings, although some features may then become unavailable.

8. HOW WE PROTECT IT

We apply technical and organisational measures appropriate to the sensitivity of the information we hold, including encryption of data in transit, access controls restricting access to personnel who need it, authentication requirements, activity logging, secure backups and supplier due diligence.

No system can be guaranteed secure. We encourage you to use a strong and unique password, to enable any additional authentication we make available, and to remain alert to phishing. **We will never ask you to disclose your password.** Communications purporting to come from us and requesting your password, or requesting payment to an account not notified through our official channels, should be treated as fraudulent and reported to compliance@vgmarkets.com.

9. YOUR RIGHTS

We offer you the following rights in relation to your personal information as a matter of policy. To exercise any of them, contact us using the details in Section 12. We may need to verify your identity before we act on a request.

- **Access** — ask for a copy of the personal information we hold about you.
- **Correction** — ask us to correct information that is inaccurate or incomplete.
- **Deletion** — ask us to delete information, subject to our legal, regulatory and record-keeping obligations, which will usually prevent deletion during the retention period described in Section 6.
- **Objection** — object to particular processing, including direct marketing.
- **Withdrawal of consent** — withdraw consent where our use is based on it, without affecting anything done beforehand.
- **Portability** — ask to receive information you provided to us in a structured, commonly used format.

We will respond within **30 days** of receiving a valid request. If we cannot complete the request in that time, we will tell you why and when we expect to respond. We do not charge for a first request; we may charge a reasonable administrative fee for repetitive or manifestly excessive requests, and we will tell you before doing so.

If you are dissatisfied with how we have handled your personal information or your request, you may complain to us under our Complaint Handling Policy (VGM-LEG-CHP-001), published on our website. As noted in Section 2, there is no data protection supervisory authority in the Union of Comoros to which you may escalate the matter.

10. THIRD-PARTY WEBSITES

Our website may link to websites operated by third parties. This Policy does not apply to them. We do not control their content, security or privacy practices, and we encourage you to read the privacy policy of any website you visit.

11. CHANGES TO THIS POLICY

We may amend this Policy to reflect changes in our practices, technology, legal obligations or business. The current version is published on our website with its version number and effective date on the cover page. Where a change is material, we will take reasonable steps to notify you. Your continued use of our services after publication constitutes acceptance of the amended Policy.

This version supersedes Version 1.0 issued in September 2026.

12. CONTACT US

For any question about this Policy, or to exercise any of the rights in Section 9, please contact us:

Data protection enquiries	compliance@vgmarkets.com
Client Support	support@vgmarkets.com
Head of Compliance	VG Markets Limited, PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros
Website	www.vgmarkets.com

Approved by the Board of Directors of VG Markets Limited. Effective 1 September 2026. Version 2.0 supersedes Version 1.0 (September 2026).