

## Privacy Policy

In order to sign a contract and to open and maintain client accounts, we obtain and hold personal information. This document was prepared in accordance with the requirements of the General Data Protection Regulation and Personal Data Protection Act.

The purpose of this document is to inform you about the nature, scope, and purpose of the collection and processing of your personal data when you use our services and/or our mobile apps or our websites: 10n.com and www.alaricsecurities.com, operated by Alaric Securities OOD (“Alaric Securities”, “we”, “us”) and what are your fundamental rights and obligations under the GDPR.

### What sort of information do we need and why?

In the course of opening an account and provision of services, we need to collect information about:

- your identification data such as name, address, ID document, date of birth, tax identification number, contact details, and other similar information, that will enable us to establish your identity;
- information about your occupation, experience, and knowledge in order to assess whether our services are appropriate to you;
- your financial situation, employment status, the source of your funds in order to prevent fraud and meet the anti-money laundering requirements;
- information about your bank details and other payment processing information as requested by the respective payment services providers.

We may also collect and process information about you through your use of our website and our app. Such information may include, among others, site areas visited, pages viewed, frequency and duration of your visit, the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser, and browser plug-in type and version, your operating system and platform, and other indirect personal data. Whenever we process such information, we will aim at always using it on an aggregated and anonymized basis.

Personal data that may be processed includes any type of electronic communications such as emails, chat messages, and telephone conversations.

In some cases, we may use your data although you are not our client, e.g. if you are a beneficial owner or a director of our corporate client.

We will request this information from you through our application forms and also use our own records and information from other sources where applicable. If you do not provide the necessary information, we may be unable to provide you with the service you have requested or to continue providing it.

In addition, our website uses a range of cookies to improve and personalize your experience. More information about these can be found in our [Cookies Policy](#).

We do not store information about your debit/credit card with which payments were made through our websites or mobile apps.

---

### **How will this information be used?**

We collect your data in order to fulfill our legal obligations, to fulfill our contractual obligations in connection to our legitimate interest in the services we provide, to enhance the services offered to you and to our customers in general.

Particularly we use the information we collect to:

- provide the services requested by you and carried out in relation to our agreement;
- verify your identity, open and manage your account;
- meet our regulatory obligations;
- process your requests related to the services (deposit and withdrawals, transactions, tax and other information demands);
- manage client relationships by means of electronic, telephone or chat communication, entering into and executing transactions with financial instruments;
- opening a demo account with us or having chat or email communication;
- improve and personalize our services to enhance your trading experience;
- provide you with market information that we believe may be relevant to you and send you important account and services related data by different communication channels, including surveys, in-app notifications, platform messages and emails we think would be of interest to you;
- do marketing communications with you about updates to our products and services and informing you about any promotions offered by us, as long as it is in our legitimate interest or you have consented to receive such communications and unless you choose to opt-out of them.

We will not sell your personal data, but it may be disclosed to:

- Any courts, regulatory or other competent authorities – in compliance with or as it is required by law;
- Other companies within the Alaric Securities group;
- Other third-party service providers we need to carry out our activity;
- Anyone you may authorise, or who may be authorised under the terms of our contract.

We will require any organisation to whom we disclose your information or who may obtain it on our behalf to ensure its confidentiality, and to handle it in accordance with the General Data Protection Regulation and Personal Data Protection Act.

### **How will we store your confidential information?**

Your information will be held on our secure computer systems and paper files. We have in place systems and procedures to prevent unauthorised access, improper modification or disclosure, misuse or loss of information.

### **How long we will store your information?**

We need to hold your information for some time after you have given it to us, even if we no longer have a relationship with you. How long we will store your data depends on the statutory regulatory terms applicable to our business. Once we consider that your information is no longer needed, we will destroy it.

---

### **Your rights under GDPR**

According to GDPR, you may:

- request a copy of the personal information we hold about you;
- ask us to amend any factual inaccuracies;
- object to the processing of your personal data for the purposes of legitimate interest;
- object to the processing of your personal data for direct marketing purposes;
- request erasure of personal data, to the extent provided by applicable law.

### **Deletion of personal data**

You may request that your accounts be closed and your personal data deleted accordingly. You need to apply for this to:

Alaric Securities OOD

Address: Bulgaria, Sofia 1303, Todor Aleksandrov Blvd. No. 20, Alaric Tower

Email: [support@alaricsecurities.com](mailto:support@alaricsecurities.com)

Phone: +359 2 439 8161

To close the account and delete your personal data accordingly, it is necessary that all your positions are closed, your obligations to the intermediary are settled, and indicate the account to which your funds will be transferred.

### **Complaints**

If you consider that we have breached our obligations under the General Data Protection Regulation and Personal Data Protection Act, or have otherwise failed to respect your confidentiality, you can complain to us by using the contact details below.

Alaric Securities OOD

Address: 20 Todor Aleksandrov blvd., Alaric Tower, Sofia 1303

Email: [info@alaricsecurities.com](mailto:info@alaricsecurities.com)

Telephone: +359 2 439 8150

If you are not satisfied with our response to any complaint, you may contact the Personal Data Protection Commission:

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: [www.cpdpc.bg](http://www.cpdpc.bg)

Address: 2 Prof. Tsvetan Lazarov str., Sofia 1592

---