

PRIVACY POLICY FOR MATADOR PRIME LLC, licensed investment intermediary

1. GENERAL

- 1.1 Matador Prime LLC, a Bulgarian company, registered under UIC 2032486, having its seat and address at Republic of Bulgaria, city of Sofia, licensed investment intermediary by Bulgarian Finance Supervision Commission, hereinafter "Matador Prime" provides its Clients (hereinafter "You" or the "Client") investment intermediary services (the "Service") pursuant to the General Terms and Conditions of Matador Prime and to the relevant individual contract, executed with each Client.(together referred as "Terms"). This privacy policy explains Matador Prime's practices regarding its collection, use and disclosure of certain information, including Your personal information when we provide the Service to You. It serves to inform You about our processing of Your personal information and ensure You that Your personal information is treated with respect and in accordance with the applicable data protection legislation when using the Service.
- 1.2 You should always feel safe when sharing Your personal information with Matador Prime. Matador Prime has taken the technical and organizational security measures that are required to ensure that Your personal information is protected from unauthorized access, use, modification and deletion.

2. PERSONAL DATA CONTROLLER

- 2.1 Matador Prime is the data controller for the processing of Your personal information handled by Matador Prime. Information on how to contact us can be found in section 11.

3. WHEN DOES MATADOR PRIME COLLECT PERSONAL DATA?

Matador Prime collects personal information about You when:

- You set up an account with Matador Prime and use the Service,
- You report errors, complain about the quality of Service or contact Matador Prime's Client services for any other reason,
- You answer a survey, including but not limited to Client satisfaction questionnaires or marketing surveys or reply to communication from Matador Prime, or
- It is otherwise necessary to manage the relationship between You and Matador Prime.

4. WHAT PERSONAL DATA DOES MATADOR PRIME COLLECT?

- 4.1 When You set up an account with Matador Prime or contact Matador Prime's Client services, Matador Prime collects personal information about You. Basic user data that Matador Prime collects includes Your full name, address, e-mail address, bank account details, other personal data, included in our KYC package, required as per MiFID II EU legal framework and applicable Bulgarian legislation in force. Matador Prime may also collect personal information that You provide about Your family members (including Your family members' names, dates of birth and their interests). When using the Service and when visiting Matador Prime's website, Matador Prime may also collect data concerning usage, viewing and technical data, including Your IP address.
- 4.2 Further Matador Prime may also collect and process Information that You provide in public forums on Matador Prime's website or to Matador Prime when You use Matador Prime's website, Matador Prime's sites on third-party platforms such as social networking sites.

5. HOW LONG IS THE DATA KEPT?

Matador Prime will keep personal information regarding You only as long as it is necessary, having regard to the purpose of the processing. This means that personal information collected and processed for marketing purposes will be stored for as long as You have an account and deleted twelve (12) months after Your contract is terminated/account closed You have given Matador Prime Your voluntary consent to continue to process such data. Matador Prime may store data for longer if required by law or if required in order to monitor Matador Prime's legal interests, for example if there are ongoing legal proceedings.

6. WHY DOES MATADOR PRIME PROCESS INFORMATION ABOUT YOU?

- 6.1 Matador Prime processes Your personal information for various purposes. Primarily, Matador Prime processes Your personal information in order to provide, manage, develop and customize the Service and its features, to manage the Client relationship with You and to meet security and other statutory regulatory requirements, including - maintenance of all Registers as per Delegated Regulation (EC) 2017/565. Your personal information may also provide the basis for market and Client analyses, market research, statistics, business monitoring and business and methodological development for Matador Prime.
- 6.2 Matador Prime also processes Your personal information to provide better and more personalized offers and services. Personal information may, for example, be processed, linked, segmented and analyzed in order, by means of targeted marketing, to provide information, offers or recommendations on Matador Prime's financial services, which are tailored to Your preferences, behaviors, needs or lifestyle.

- 6.3 In addition to the above, Matador Prime processes Your personal information to prevent, detect and investigate potential prohibited or illegal activities, including fraud, and to enforce our terms of use.

7. WHAT IS THE LEGAL BASIS FOR THE PROCESSING?

- 7.1 A majority of the personal information that Matador Prime processes about You are processed because it is necessary for Matador Prime's performance of the Terms, i.e. in order for Matador Prime to be able to provide and administer the Service and its features. Such is the case when Matador Prime processes, *inter alia*, Your contact information such as Your e-mail address or Your phone number and information from the payment service provider.
- 7.2 Some of the personal information which Matador Prime processes are processed based on a balance of interest, i.e. Matador Prime's interest of processing the data outweighs the impact and risk the processing may have on Your integrity.
- 7.3 To the extent that processing is carried out on the basis of a consent, it is voluntarily for You to give such a consent and You may at any time, wholly or partly, withdraw Your consent. If You choose to withdraw Your consent, and Matador Prime's processing is such that it requires Your consent, the processing will be carried out in accordance with Your most recently given consent.

8. DATA SECURITY AND INTEGRITY

The security, integrity and confidentiality of Your personal information is all important to us. We have implemented technical, administrative and physical security measures that are designed to protect Your personal information from unauthorized disclosure, use and modification. From time to time, we review our security procedures in order to assess the need to implement additional measures or to make technical upgrades to existing procedures. Please be aware that, despite our best efforts, few security measures are impenetrable, and we therefore kindly ask that You inform us immediately of any suspicious activities that You notice in the Service.

9. WHO DOES MATADOR PRIME GIVE THE DATA TO?

- 9.1 Matador Prime may disclose Your personal information to tied agents, affiliates, business partners and other third parties in order to fulfil the agreement with You or to fulfill agreements with Matador Prime's suppliers and partners.
- 9.2 Matador Prime may also disclose personal information to companies that process personal information on our behalf, such as our IT system providers, Client service companies and affiliates. If personal information is disclosed to such companies that process data on Matador Prime's behalf, Matador Prime enters

into data processing agreements with such parties in order to ensure that a high level of security for Your personal information is maintained.

- 9.3 Personal information may also be disclosed, if needed, to comply with statutory legal requirements or requirements from regulatory authorities, such as Bulgarian Finance Supervision Commission, to safeguard Matador Prime's legal interests or to detect, prevent, or pay attention to fraud and other security or technical issues.
- 9.4 Your personal information may be transferred to or stored in a country outside the EU/EEA. If Your personal information is transferred or stored outside the EU / EEA, special safety measures will be taken, we will e.g. ensure that such transfer is carried out in accordance with this privacy policy and as permitted by the applicable laws on data protection, for example through the use of data transfer agreements that includes de standardized EU-model clauses for transfer of data adopted by the EU Commission and that are available on the EU Commission's website.

10. CHANGES TO THE PRIVACY POLICY

This privacy policy may be revised from time to time. If Matador Prime makes any significant changes to the privacy policy, Matador Prime will inform You by e-mail or through the Service before the changes take effect. The privacy policy will also be published on Matador Prime's website. If any change requires Your consent, Matador Prime will obtain a new consent from You.

11. RIGHT TO REQUEST INFORMATION AND CORRECTIONS ETC.

- 11.1 You have the right to be given free information about, inter alia, the personal information that Matador Prime processes on You and for what purpose Matador Prime is processing Your personal information (so-called record extract). Any such request for a record extract must be made in writing and be signed by You.
- 11.2 You are also entitled to have inaccurate, misleading or incomplete data corrected, anonymized or deleted. You are also entitled to request Matador Prime to restrict the processing of Your personal information and to object to the processing. Furthermore, You may exercise Your right to data portability, which means that You have the right to receive the personal information processed about You in a structured, commonly used and machine-readable format.
- 11.3 Please note that some of the rights above only may be exercised in certain situations, e.g. the right to data portability, which only applies when the processing is carried out on the basis of an agreement or a consent and if the processing is carried out by automated means. In case You have any questions regarding how Matador Prime processes Your personal information, want to exercise any of Your rights or want to know more about the rights, you may contact us as indicated below:



E-mail address: office@matadorprime.eu

Address: Republic of Bulgaria, city of Sofia (Postal code: 1421),

30 "Sveti Naum blvd." , 4th floor (Lozenets District)

Tel.: +359 249 49340,

Contact person: Jorge Portero Sanchez, Executive director of Matador Prime LLC

- 11.4 You are also entitled to lodge a complaint with a supervisory authority if You consider that Your personal information has been processed in contradiction with applicable data protection legislation.
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Adopted by Protocol of the Directors of Matador Prime LLC, dated May 23-rd, 2018