

PRIVACY POLICY

DATED JANUARY 2, 2026

When using our services we process personal data of our customers (“**you**”, “**your**” or the “**Customer**”). This Privacy Policy (the “**Policy**”) provides you with information about how your data are processed.

In this Privacy Policy, you will find information regarding the following:

1. Who is the processing your personal data and whom to contact?
2. What information do we collect about you and how do we obtain it?
3. How do we use your personal data?
4. How do we store personal data and how are they secured?
5. To whom do we make your personal data available?
6. Do we transfer your data to third countries and international organisations?
7. What are your rights and how can you exercise them?

1 WHO IS PROCESSING YOUR PERSONAL DATA AND WHOM TO CONTACT?

The processing of your personal data is performed by VRGK Tech Pty Ltd, ACN 640 619 521, with its registered address at Three International Towers Level 24, 300 Barangaroo Avenue, Sydney, NSW, 2000, Australia (hereinafter referred to as “**we**”, “**our**”, “**our Company**”, or “**Controller**”).

We are bound by the Privacy Act 1988 (“**Privacy Act**”, “**the Act**”), including the Australian Privacy Principles (“**APPs**”), and recognises the importance of ensuring the confidentiality and security of your personal information.

You can contact us at Three International Towers Level 24, 300 Barangaroo Avenue, Sydney, NSW, 2000, Australia, or at support@ftmo.com regarding any questions and the exercise of rights relating to the processing of your personal data or the content of this Privacy Policy. Additionally, we have a designated Privacy Officer to assist us with all things related to privacy.

2 WHAT INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE OBTAIN IT?

- 2.1 In this section, you can read general information about which of your personal data we collect and how we collect it. Detailed information on the purposes for which we process personal data is given in Section 3 of this Policy. All information on the basis of which we can directly or indirectly identify you or which is related to you is considered personal data.
- 2.2 We obtain most of the data we process about you directly from you in connection with your use of our services. Other data about you is provided to us by third parties, such as providers of trading platforms that you choose for use of our services, and social network operators if you decide to link your social networking accounts to an account on the website or from publicly available sources such as various governmental registers.
- 2.3 Data that you provide to us yourself, especially when you register on the website, enter information into your user account, order services, participate in our events and projects, or when you communicate with us through customer support or social networks. These are **identification and contact data**, specifically the name, surname, telephone number, e-mail address, postal address, date of birth, and for purposes of Know Your Client we will collect your face recording and will require your ID card as well. Further we

will process username and password, and if you are an entrepreneur your business identification number or tax registration number; **payment data**, such as bank details; and **other data**, such as records of communication between you and our company or details of any warranty claims.

- 2.4 Data that we automatically collect when you use our services. These are **data about your device** (such as the IP address, device type, operating system, browser used, connection provider); **website usage data** (such as the date, time and duration of visit, a country from which you visit the website, website browsing history, other information stored via cookies), and **data on the use of services** (such as the login and logout information, your account settings, the value of your fictitious capital, your account currency, business strategy).
- 2.5 **Data about the simulated trading and payment transactions** you have completed (such as the type of financial instrument, time of opening and closing the position, amount of investment, profit and loss) and **data from social networks** (username, profile picture, e-mail address associated with the account on the social network). For information on how your personal data are processed by trading platform providers and social network operators for their own purposes, please refer to the privacy policies of those parties.

3 HOW DO WE USE YOUR PERSONAL DATA?

3.1 We use personal data for the following purposes:

- a. Registration and Client Area Profile
- i. In order to use the services, you must register on the website and create your account, and for this purpose we process your personal data.
 - ii. Personal data: identification and contact data; we may also process your data related to the settings of your user account.
 - iii. Legal ground for the processing: Processing is necessary for the performance of the contract, and the provision of these personal data is required, as we cannot register your user account without them.
- b. Fulfillment of our legal obligations and orders from court or governmental agencies
- i. In order for us to provide services, we have to process certain information required of us by law or agencies with enforcement powers, specifically to comply with our obligations in relation to anti-money laundering legislation.
 - ii. Personal data: first and last name, date of birth, address, proof of address and ID, information on tax residency, face recording (biometrics)
 - iii. Legal ground for the processing: Processing is necessary to fulfil our legal obligations and consent in case of sensitive information
- c. Provision of services and exercise of rights and obligations under the contract between us and you as our customer
- i. In order to be able to provide you with our services, i.e. in particular to provide you with the relevant access, tools and support, and to carry out trades, we need to process your personal data. For this purpose, the following shall apply:

- ii. Personal data: Identification and contact data and, in the case of paid services, also payment data, data on the use of the services, data on the simulated trades and, if you decide to link your social networks accounts with the account on the website, also data from social networks.
 - iii. Legal ground for the processing: Processing is necessary for the performance of the contract on the basis of which we provide our services, or on the basis of our legitimate interest. After we stop providing you with services, we process personal information for a limited period of time. Such processing is necessary for the purposes of exercising and protecting our rights based on our legitimate interests.
- d. Marketing communication about our services and products or about events in which we take part
- i. If you are our current or past customer, we may from time to time send you marketing communications that relate to our services. We may also send you commercial communications to the extent to which you give us your consent. Each of the e-mails sent will be marked as a business communication and each of them will contain a link with the help of which you can easily unsubscribe from the business communications. For this purpose, the following shall apply:
 - ii. Personal data: Identification and contact data.
 - iii. Legal ground for the processing: If we have provided you with our services, we may from time to time send you marketing communications based on our legitimate interest, namely keeping in touch with our customers. If you give us your consent to process your data for marketing purposes, then we process your data on the basis thereof.
- e. Customer support communication and compliant handling
- i. If you use our customer support services, we will process your personal data. For this purpose, the following shall apply:
 - ii. Personal data: Identification data, contact data, other data and data from social networks, if you contact us through social networks.
 - iii. Legal ground for the processing: Processing is based on our legitimate interest, namely in maintaining customer satisfaction and supporting the use of our services.
- f. Customer relationship management and improvement of services
- i. If you use some of our services, we will process your personal data in order to develop, test and enhance the services and improve their security. We also like to provide the best service possible to you and that includes analyses of how you use our services as well as your satisfaction with them (including complaints investigation and handling). For this purpose, the following shall apply:
 - ii. Personal data: Identification and contact data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.
 - iii. Legal ground for the processing: Processing is based on our legitimate interest, namely in improving our services.

g. Analytics

- i. To obtain information about how our website and our services are used, we analyse customer behaviour. For this purpose, the following shall apply:
- ii. Personal data: Identification data, contact data, payment data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.
- iii. Legal ground for the processing: Processing is based on our legitimate interest, namely in ascertaining customer behaviour and estimating customer preferences.

h. Prevention of unfair and fraudulent behaviour

- i. Sometimes certain persons act in a way that takes unfair advantage of our services and such behaviour is in breach of our contractual requirements. This behaviour is not only contrary to what our services are about but causes damage to us and indirectly to our other customers as well. In order to identify and prevent such behaviour we have developed preventive measures which include processing of data of our customers.
- ii. Personal data: Identification data, contact data, payment data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.
- iii. Legal ground for the processing: Processing is based on our legitimate interest, namely identification and prevention of unfair and fraudulent behaviour

4 HOW DO WE STORE PERSONAL DATA AND HOW ARE THEY SECURED?

We process your personal data in an encrypted database on computers and other devices. In order to ensure protection against unauthorised access or unauthorised alteration, disclosure or destruction of the data that we collect and process, we have adopted organisational and technical measures to secure them, which we strictly adhere to.

5 HOW LONG DO WE PROCESS YOUR DATA?

- 5.1 Personal data are processed to the extent necessary to fulfil the purposes described above and for the time necessary to achieve those purposes or for a period directly stipulated by law. Thereafter, the personal data are deleted or anonymised.
- 5.2 To determine the appropriate retention period for your data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting and other requirements.
- 5.3 By law we have to keep your personal data (including call recordings) during our business relationship and upon its termination, for a minimum period of up to 7 (seven) years from the date of termination of the Platform/Service. The data storage period may be extended upon the request of the competent authority (regulator of the Company's licensed activities).
- 5.4 At the expiration of the data retention period the data is erased by irreversible process, and we also inform all third parties, to whom the data was transferred, regarding such erasure and request implementation of similar actions on their part.

6 DATA SHARING AND TRANSFERS TO THIRD COUNTRIES

- 6.1 We make your data available or transfer them to persons that help us provide our services, in particular the following persons:
- a. The trading platform providers, in order to enable you to perform the simulated trades.
 - b. Other third parties that help us run our website and provide our services (such as other companies in our group, hosting and cloud service providers, providers of identification verification tools, payment system operators and financial institutions, providers of customer support tools and services, IT companies and system administrators, marketing and communication agencies, lawyers, accountants and auditors, contractors, consultants and service providers);
 - c. Organisations involved in a transfer or sale of all or part of our assets or business. In the event of sale or transfer of our business we will share your personal information with the parties involved if it is required as part of the sale or transfer arrangements.
 - d. Regulatory bodies, government agencies, law enforcement bodies and courts. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal processes, to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.
 - e. Anyone else to whom you authorise us to disclose it or is required by law. We will share your personal information with a third party if we are required by law or if you authorise us to do so and it does not cause a conflict to any of our legal obligations as an Australian Financial Services License.
- 6.2 In addition, we may transfer your data to persons in respect of which you give your consent thereto, as well as in the cases where it is our obligation under the law or under a judicial or any other legally binding decision. Each such entity to whom personal data are transferred is contractually obligated to protect your personal data in accordance with legal provisions and to process the data exclusively according to our instructions.
- 6.3 Certain third parties collect personal data for their own purposes as controllers. In such a case, their own rules for the processing of personal data shall apply.
- 6.4 Certain vendors we cooperate with are not based in Australia and therefore your personal data will be transferred outside of Australia. In most case personal data will be transferred to European Union, however, other countries maybe included as well. However, in all cases of transfer of personal data outside of Australia we take reasonable steps to ensure the protection of your personal data.

7 YOUR RIGHTS

- 7.1 You can exercise all your rights mentioned below, including your right to erasure of personal data and the withdrawal of your consent, by sending a request to us via email at privacy@ftmo.com, alternatively you can use our contact details in Section 1 of this Privacy Policy. There are no specific words that you must use in your request, but please be specific enough, so we can help you with your request (e.g. identify yourself, specify the right you wish to exercise, what action you wish us to take, details of what personal data you want erased/deleted, etc.)
- 7.2 In connection with the processing of personal data you have the following rights:

a. Right of access to personal data

- i. You can ask us at any time to send you a confirmation as to whether or not your personal data are being processed. If we process your data, we will provide you with further details on the processing. If you request it, we will also provide you with a copy of the personal data processed. Please note that the first copy is free of charge, but later copies will be provided for a small fee.

b. Right to rectification of personal data

- i. If we process your personal data inaccurately, you can notify us of this fact, and we will rectify the inaccurate personal data without undue delay. If you register on the Website, you will be able to rectify and amend your personal data yourself by editing your user account.

c. Right to erasure of personal data ("right to be forgotten")

- i. You have the right to obtain from us the erasure of personal data concerning you without undue delay in the following cases:
 - 1. If the data are no longer necessary in relation to the purposes for which we have collected or otherwise processed them;
 - 2. If you withdraw your consent to their processing and, at the same time, there will be no other legal ground for their processing (this only applies in the cases where we process personal data on the basis of your consent);
 - 3. If you object and there are no overriding legitimate grounds for the processing, or if you object to the processing for direct marketing purposes; or
 - 4. If your personal data are processed unlawfully.
- ii. We will not be able to act on the request for the erasure of personal data if their processing is necessary for exercising the right of freedom of expression and information, for compliance with any of our legal obligations, for the performance of a task carried out in the public interest, for the establishment, exercise, or defence of our legal claims, or for other reasons provided for by law.

d. Right to withdraw consent

- i. If processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on the consent given before its withdrawal.

e. Right to lodge a complaint

- i. You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with us via:
 - 1. Post: Three International Towers Level 24, 300 Barangaroo Avenue, Sydney, NSW, 2000, Australia
 - 2. Email: support@ftmo.com
- ii. If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner (**OAIC**): Office of the Australian

Information Commissioner: www.oaic.gov.au, Phone: 1300 363 992, address: GPO Box 5288, Sydney NSW 2007

8 FINAL PROVISIONS

We may change this policy unilaterally, but we will do so only when necessary and we will notify you about such change. You can find the latest version of this policy in your Client Area.