

Neapolis llc – Tivat, Montenegro

Protecting the privacy and safeguarding the personal and financial information of our clients and website visitors is one of our highest priorities. The following Privacy Statement explains how Neapolis llc collects and protects your personal information.

By opening an account or by using our websites, you give your consent to the collection and use of personal information by Neapolis llc as explained in this Privacy Statement.

Collection of personal information

We collect your personal information directly from you and indirectly as a result of your relationship with us. Neapolis llc may use the information collected from you to verify your identity and contact information, establish your trading account, issue you an account number and a secure password, maintain your account activity and contact you with account information, among other reasons. This information also helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

You directly provide us with the majority of information we collect. This information includes your contact details, including name, mailing address, telephone number and e-mail address, personal identification data we are required by law to collect, including your passport number and/or tax identification number. We also collect demographic information when you open an account, including gender, birth date, occupation and employment status.

You provide us with this information by completing the account application and related documentation, by sending us an e-mail or by submitting information in response to a promotion or special offer.

The information we collect indirectly from you includes your Internet protocol ("IP") address, browser type, operating system, Internet service provider (ISP), time stamps and transaction history.

Should you close your account with us, Neapolis llc will retain your information, but only use it to comply with regulatory requirements and to periodically contact you to offer you the opportunity to reactivate your account or participate in other offers.

Cookies

We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any third party. Cookies are readable only by us and do not contain any personal

information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited.

We may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner advertisements. The information collected by the advertising company through the use of these pixel tags is not personally identifiable. We may also use third party software to track and analyze usage and volume statistical information including page requests, form requests and click paths. The third party may use cookies to track behavior and may set cookies on behalf of Neapolis llc.

All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services but some functions may not work as designed.

Sharing Personal Information with Neapolis llc affiliates and Non-affiliated third parties

Neapolis llc does not sell, license, lease or otherwise disclose your personal information to any affiliate or third party for any reason, except as described below.

Neapolis llc may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer.

To help us improve our services to you, we may engage another business to help us carry out certain internal functions, such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a non-affiliated third party with client information from our database, including your name, address, phone number, and/or e-mail address, to help us analyze and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us.

When required by law, Neapolis llc reserves the right to disclose your personal information to third parties or regulatory, law enforcement or other government authorities. We may also disclose your information to credit reporting or collection agencies, or when necessary to protect our rights or property.

The security of your personal information

We employ security software, systems and procedures to offer you a safe and secure environment and to protect your personal, financial and trading information.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of Neapolis llc employees who have a need to know this information will have access to your account number, User ID, and password. Remember that you are ultimately responsible for maintaining the secrecy of your account number, User ID and password. We strongly recommend that you do not disclose this information to anyone.

You may contact Neapolis llc for any reason under this Privacy Statement, or otherwise, as follows:

International:

Email:

Postal:

YOUR PRIVACY RIGHTS

This section explains your rights in relation to your personal information in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

You are entitled to receive personal information free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the personal information for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described below please contact us:

International:

Email:

Postal:

Accessing your information

When can you request access?

You have the right to:

- confirmation that your personal information is being processed
- access to your information, and
- other certain information (most of which should be in our privacy policy anyway).

You can request copies of paper and electric records about you that we hold, share or use. To deal with your request, we can request proof of identity and enough personal information to enable us to locate the personal information you request.

When will access not be provided?

We can only provide you with *your information*, not personal information about another person. Also, where access would adversely affect another person's rights, we're not required to provide this. Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

Please clearly set out in your access request the personal information that you're requesting. If this is not clear, we may come back to you to ask for further personal information by way of clarification.

Correcting your information

You have the right to obtain from us without undue delay the rectification of inaccurate personal information concerning you. If you tell us that the personal information we hold on you is incorrect, we will review it and if we agree with you, we will correct our records. If we do not agree with you we will let you know. If you wish, you can tell us in writing that you believe our records still to be incorrect and we will include your statement when we give your personal information to anyone outside the Napolis llc. You can contact us using the details in the section above in the main body of the privacy notice headed 'Obtaining further personal information from us'.

You may also have the right to have incomplete personal information completed, including by means of providing a supplementary statement. Whether or not this is appropriate in any particular case depending on the purposes for which your personal information is being processed.

We need to notify any third parties with whom we've shared your personal information that you've made a rectification request. We'll take reasonable steps to do this, but if it is not possible or may involve disproportionate effort we may not be able to do this or ensure they rectify the personal information they hold.

How you can see and correct your information

Generally, we will let you see the personal information that we hold about you, or take steps to correct any inaccurate information, if you ask us in writing.

Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

Erasing your information

When can you request erasure?

You have a right to have your personal information erased, and to prevent processing, where:

- the personal information is no longer necessary for the purpose it was originally collected/processed;
- you withdraw consent (where previously provided);
- you object to the processing and our legitimate interests in being able to keep processing your personal information don't take priority;

- we've been processing your personal information in breach of data protection laws; or
- the personal information has to be erased in order to comply with a legal obligation.

When can we refuse erasure requests?

The right to erasure does not apply where we are required to retain it for legal or regulatory purposes or where your information is processed for certain specified reasons, including for the exercise or defense of legal claims.

More importantly, if we have to erase your data we may not be able to provide you with our services.

Do we have to tell other recipients of your personal information about your erasure request?

Where we have provided the personal information you want to be erased to third parties, we need to inform them about your erasure request, so they can erase the personal information in question. We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

It may also be that the recipient is not required/able to erase your personal information because one of the exemptions above applies.

Restricting processing of your information

When is restriction available?

You have the right to restrict the processing of your personal information:

- where you disagree with the accuracy of the information, we need to restrict the processing until we've verified the accuracy of the information;
- when processing is unlawful and you oppose erasure and request restriction instead;
- if we no longer need the personal information but you need this to establish, exercise or defend a legal claim; or
- where you've objected to the processing in the circumstances detailed in paragraph (a) of "Objecting to processing", and we're considering whether those interests should take priority.

Do we have to tell other recipients of your personal information about the restriction?

Where we've disclosed your relevant personal information to third parties, we need to inform them about the restriction on the processing of your information, so that they don't continue to process this.

We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

We'll also let you know if we decide to lift a restriction on processing.

Taking your personal information with you

When does the right to data portability apply?

The right to data portability only applies:

- to personal information you've provided to us (i.e. not any other information);
- where the processing is based on your consent or for the performance of a contract; and
- when processing is carried out by automated means.

When can we refuse requests for data portability?

We can refuse your data portability request if the processing does not satisfy the above criteria. Also, if the personal information concerns more than one individual, we may not be able to transfer this to you if doing so would prejudice that person's rights.

Objecting to processing

You can object to processing in the following circumstances:

(a) Legitimate interests

You've the right to object, on grounds relating to your particular situation, at any time to processing of personal information concerning you which is based on legitimate interests.

If we can show compelling legitimate grounds for processing your personal information which override your interests, rights and freedoms, or we need your personal information to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

(b) Direct marketing

You can object at any time to your personal information being used for direct marketing purposes (including profiling related to such direct marketing).

If you sign up to receive newsletters or other e-mail messages from us, you can opt-out at any time free of charge by clicking the unsubscribe link at the bottom of the message or by contacting us:

International:

Email:

Postal:

Automated decision making and profiling

You've the right not to be subject to a decision based solely on automated processing, including profiling, which has legal consequences for you or similarly significant effects.

As explained in the main part of our Privacy Policy, we use technology that does this. We only do so where:

- this is necessary for entering into, or performance of, a contract between us;
- this is authorized by applicable law; or
- We've obtained your explicit consent to do so for these purposes.

While we're confident that the technology works, we understand that not everyone is comfortable with decisions being left entirely up to machines. That is why you can request human intervention - let us know your concerns and contest the decision if you think our technology has got it wrong.