



Privacy Notice for European Residents

Our Privacy Commitment to You

24 Exchange respects your privacy. Your trust is one of our most valuable assets. One way we hope to keep your trust is by properly protecting your personal information.

What Does This Notice Cover?

This Notice is intended for customers, clients, participants and other business partners of ours who are European residents. It briefly describes how we collect personal information about you, how we use and share it, your rights under the General Data Protection Regulation (“the Regulation”), and how you can contact us about them.

Who We Are

When we refer to “24 Exchange”, “us”, “our”, or “we” in this Notice, we mean 24X Bermuda Holdings LLC (Bermuda) and its subsidiaries and affiliate companies. In most situations, 24 Exchange is a *Data Controller*, which means we are responsible for decisions about how your personal information is collected, used, and disclosed. In others, 24 Exchange may also be a *Data Processor* acting on behalf of another entity.

If you have any questions, have a complaint, a request or wish to send us comments about this Privacy Notice for European Residents, e-mail us at privacy@24exchange.com or write to us. We will investigate your complaint, and use reasonable efforts to respond to you as soon as possible.

Our postal address is:

24X Bermuda Holdings LLC
Attn: Privacy Office
c/-Maples Corporate Services (Bermuda) Limited,
Cumberland House, 7th Floor, 1 Victoria Street
Hamilton, Pembroke, HM11, Bermuda

Purpose and Legal Basis for Processing:

If you are located in Europe, we need a lawful basis to collect and use your personal data. Our lawful basis will depend on the information concerned and the context in which it is processed. The type of information we collect varies and depends on your relationship with us, and the agreement, product or service you have with us.

Collecting personal information about you helps us serve you, communicate with you, provide relevant products and services, and improve the administration of our business.

To collect, use and process your personal information, we rely on one or more of the following lawful bases permitted by the Regulation:

- where we need to perform a contract or agreement you have entered with us,



- where it is necessary for our legitimate interests (such as the operation of our business and to comply with our legal duties or regulatory obligations),
- for the protection of your vital interests (e.g. confirm your identity, prevent fraud, etc.),
- for the performance of a task carried out in the public interest,
- your consent (when needed).

We obtain personal information from you when you submit an application, agreement or other similar forms, as well as from transactions and other interactions with you. This information includes:

- Personal data. Name, address, email address, telephone number, date of birth, ID number, and citizenship,
- Financial data. Income, assets and banking information
- Interaction data. Data collected when you visit or use our websites, mobile applications, and social media sites.

Our websites use 'cookies' and similar technology. A cookie is a small text file placed on your device when you visit our websites. They help us make the sites work better for you, diagnose technical problems, and for security purposes.

We may also obtain information from third parties and publicly available sources such as consumer reporting agencies, social media services and business partners.

How Do We Use and Share the Personal Information We Have Collected About You?

All financial services companies need to use and share customers' personal information in order to provide services to them. We use your personal information mainly to communicate with you, complete transactions that you have requested or authorized, administer your policy or account, and to make you aware of additional products and services that we offer.

As permitted or required by law, your personal information may be shared:

- with employees and associates when their jobs require it to process and service your contracts or accounts,
- with third parties that perform services on our behalf. They are required to have information protection safeguards in place. They are contractually bound to use your information only to perform those services. They are not permitted to use or disclose your information for their own marketing purposes,
- to participate in research studies or to conduct surveys,
- in response to subpoenas and court orders, or to comply with legal requests made by law enforcement and regulatory authorities.

We will use your personal information only for the purposes for which it was obtained, unless we reasonably consider that we need to use it for another purpose which is compatible with the original purpose for which you provided it to us. If we need to use your personal data for a purpose that is unrelated to the original purpose for which you provided it to us, we will notify you and explain the legal basis which allows us to do so.

We will not sell to or share your information with any unaffiliated company for the purpose of that company marketing its own products or services directly to you.



How Do We Protect the Personal Information We Have Collected About You?

We have implemented appropriate administrative and technical safeguards in place that are intended to protect your personal information. Our employees respect your personal information and are trained to keep it safe. You should be aware that we will never ask for your personal information (such as account numbers, ID numbers, or passwords) through an unsolicited email or phone call.

How Long Do We Retain Your Personal Information?

The length of time we retain personal information depends on your relationship with us. If you are a customer, for example, we will retain your personal information for 5 years from the date your account is closed, policy surrendered or other relationship ends, unless a longer retention period is required by law. We need to retain it to meet regulatory oversight and other legal obligations to which we are subject. We will assess and, where appropriate, securely delete it to ensure it not retained for longer than reasonably necessary.

Processing of Your Personal Information Outside Europe

24 Exchange's data centers, websites and applications are hosted in the United States and United Kingdom. Your personal information will be processed outside of the European Economic Area (EEA), subject to contractual restrictions regarding confidentiality and security in accordance with applicable data protection laws and regulations. We will not disclose your personal information to third parties who are not authorized to process them. We have administrative, physical, and technical safeguards in place that are intended to protect it and help ensure it receives an adequate level of protection as it does in the EEA.

Your Rights

You have rights which you can exercise in relation to the personal information we hold about you in certain circumstances to:

- Request a copy of your personal information (access) and further details about its processing,
- Request an update or correction (rectification) to it,
- Request its deletion (erasure) under certain conditions,
- Request a restriction on its processing,
- Object to our processing, and
- Request the transfer of your personal information to another person or entity.

If you want to exercise one of these rights please contact us in writing.

Changes to this Notice

This Notice is effective as of October 1, 2022. We may make changes to it from time to time. You can always find an up-to-date version on our website or can contact us for a copy.