

INFINOX

TRADING POWER

Privacy Policy

INFINOX Capital Limited

February 2026

Contents

1. About INFINOX	2
2. INFINOX's Commitment	2
3. Reasons for Collecting Personal Information	2
4. Personal Information Collected From You	2
5. Use of Personal Information	3
6. Disclosure and Sharing of Personal Information	4
7. Your Rights	4
8. Updating Your Information	5
9. Accessing Your Information	5
10. Cookies and Website Information	6
11. Information Collected at Our Premises	6
12. Storage of Information	6
13. Data Security	7
14. Retention of Information	7
15. Amendments to Policy	8

1. About INFINOX

INFINOX Capital Limited ("INFINOX") is a broker regulated by the Financial Conduct Authority (FCA) and headquartered in London.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If you have any questions about this policy or how we collect and use personal information about you please contact us using the contact details below. We also have a dedicated Data Compliance Officer, who is responsible for data compliance issues.

Postal Address:

INFINOX Capital Limited
90 Bartholomew Close, London, England, EC1A 7BN

Email: compliance@infinox.co.uk

2. INFINOX's Commitment

INFINOX is committed to protecting the privacy of your personal and financial information. This Privacy Policy explains how we collect, use, store, share and protect personal information that you provide to us, that we receive from third parties, or that we collect through your use of our website, platforms and services. We process your personal information in accordance with this Privacy Policy and applicable United Kingdom data protection law.

Data protection law says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. Reasons for Collecting Personal Information

INFINOX collects certain personal information in order that it may meet the needs of its clients. By collecting certain personal information, INFINOX is able to monitor and improve the services which it offers to its existing and potential clients.

INFINOX will use this information for the following purposes:

- verifying your identity,
- assessing the appropriateness of the products and services we provide,
- establishing and maintaining your account,
- providing our services to you,
- improving our services,
- regulatory notifications and
- marketing.

4. Personal Information Collected From You

INFINOX will collect and hold information about you when you complete an application or other type of form or access and trade on your account through our trading platforms or another service we provide to you. The kind of personal information you give us may include (but is not limited to) name, address, date of birth, passport number, tax identification number, email address, telephone number, employment and income information, credit/debit card information, transaction history and financial statements.

INFINOX may derive information from your use of this website or another service we provide to you and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link.

By opening an account with INFINOX and by placing Orders and entering into Transactions, you acknowledge that you will be providing personal information within the meaning of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation to us, and you consent to the processing of that information by INFINOX for the purposes of performing its obligations under the Client Agreement and administering the relationship between you and INFINOX.

INFINOX needs certain information to carry out an agreement with you and you must provide this in order to enter into an agreement with INFINOX to provide you with products and services. If you do not wish to share such information, we may not be able to offer you any products or services. Mandatory information fields are generally set out in the application.

Other correspondence or interaction (for example by email) between you and INFINOX, will include personal information (such as names and contact details) in that correspondence. This may include enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organisation.

5. Use of Personal Information

INFINOX may keep and use such information to comply with any legal requirements or if it is necessary for our legitimate interest or for any one or more of the following purposes:

- To provide the services to you that you have requested including processing transactions.
- To confirm your identity.
- To maintain your personal profile.
- To manage your account.
- To contact you when necessary or appropriate in relation to the services being provided to you.
- To keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of INFINOX.
- To manage and administer the products and services provided to you.
- To provide you with information regarding the products and services offered by INFINOX.
- To develop an understanding of the products and services that you may be interested in obtaining from INFINOX.
- To provide you with information or opportunities that we believe may be relevant to you.
- To tailor the website or other service we provide to you to your needs and interests.
- To create anonymised statistical data.

You consent to INFINOX using your personal information for the above-stated purposes.

Where we use your personal information for marketing purposes to inform you about INFINOX's products and services that might be of interest to you, you always have the right to 'opt out' of receiving such a communication.

You can exercise the right at any time by contacting us using the details provided at the start of this policy. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you opt-out of our marketing materials you will be added to our 'suppression list' to ensure we do not accidentally send you further marketing. We may still need to contact you for administrative or operational purposes, but we will make sure that those communications do not include direct marketing.

If you are an existing customer or are acting as a business we use your contact details as necessary for our legitimate interests in marketing to you and maintaining a list of potential customers.

If you are not an existing customer, and are not acting as a business, we will only contact you for marketing purposes with your consent (whether we have collected your details directly from you, or through a third party).

INFINOX will only use your personal information for the purposes for which it collected it as set out in this policy, unless INFINOX reasonably considers a need to use it for another reason and that reason is compatible with the original purpose. If INFINOX needs to use your personal information for an unrelated purpose, INFINOX will notify you and will explain the legal basis which allows us to do so.

6. Disclosure and Sharing of Personal Information

INFINOX does not sell, licence or otherwise disclose your personal information to third parties for marketing purposes. We do use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

INFINOX may be required to provide your personal information to the Financial Conduct Authority and other regulatory and government bodies from time to time in the UK. INFINOX may also disclose your personal information to:

- Financial institutions and other similar organisations that it deals with in the course of its corporate activities, or those that are nominated by you.
- External service providers and professional advisers (which may be located overseas) that provide services to INFINOX.
- Any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant.
- Any third parties where this is necessary to process a transaction or provide services which you have requested; or any authority to whom INFINOX is required to disclose such information by law.

In the event that INFINOX is subject to negotiations for the sale of its business (whole or party of), or sold to a third party or undergo a re-organisation, you agree that any of your personal information which we hold may be disclosed to such party or its advisors as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation or transferred to that re-organised entity or third party and used for the same purposes as you have agreed to under this Agreement.

7. Your Rights

You are not required to provide any personal information requested by INFINOX. However, without that information, INFINOX may be unable to open an account for you, where the information is requested in an application form, or to provide you with any other services, information or assistance you have sought.

Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office (ICO). Under certain circumstances, by law you have the right to:

- Be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why INFINOX is providing you with the information in this policy. If you require any further information about how we use your personal information, please let us know.
- Request access to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information INFINOX holds about you and to check that INFINOX is lawfully processing it. INFINOX does not normally charge a fee for providing access to the information, however, we may charge a reasonable fee if your request is manifestly unfounded or excessive, or if you request further copies.
- Request a correction of the personal information that INFINOX holds about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request an erasure of your personal information. This enables you to ask INFINOX to delete or remove personal information where there is no good reason for us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where INFINOX is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to INFINOX using your information on this basis and INFINOX does not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may

need it to defend a legal claim). You also have the right to object where INFINOX is processing your personal information for direct marketing purposes.

- Request a restriction of processing of your personal information. This enables you to ask INFINOX to suspend the processing of personal information about you, for example if you want INFINOX to establish its accuracy or the reason for processing it.
- Request a transfer of your personal information to another party where you provided it to INFINOX and INFINOX is using it based on your consent, or to carry out a contract with you, and INFINOX processes it using automated means.
- Withdraw consent. In the limited circumstances where INFINOX is relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once INFINOX has received notification that you have withdrawn your consent, INFINOX will no longer process your information for the purpose or purposes you originally agreed to, unless INFINOX has another legitimate interest in doing so.
- Lodge a complaint. If you think that INFINOX is using your information in a way which breaches data protection law, please contact us in the first instance using the contact details provided in section 1 of this Policy. You also have the right to raise a complaint with the data protection supervisory authority, the ICO.

8. Updating Your Information

You may inform INFINOX at any time that your personal details have changed or that you wish INFINOX to review, verify, correct or request erasure of your personal information that we hold about you, withdraw your consent to the processing or request that we transfer a copy of your personal information to another party. Please contact us at compliance@infinox.co.uk.

INFINOX will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

9. Accessing Your Information

Under the UK data protection legislation, you have, subject to certain exceptions, the right to obtain copies of any personal information which INFINOX holds about you, the purposes for which they are being or are to be processed, and the recipients or classes of recipients to whom such information is or may be disclosed. You are entitled to inform INFINOX of any inaccuracy in your personal information.

If you wish to access any personal information INFINOX may hold or wish INFINOX to correct any misinformation please notify us in writing using the address provided in section 1 of this Policy. INFINOX does not normally charge a fee for providing access to the information, however, we may charge a reasonable fee if your request is manifestly unfounded or excessive, or if you request further copies.

INFINOX may need to request specific information from you to help to understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Please consider your request responsibly before submitting it. INFINOX will respond to your request as soon as possible. Generally, this will be within one month from the date your request was received. If the request is going to take longer to deal with, INFINOX will let you know.

If you make a written request to us, we will also correct, delete and/or restrict processing of personal information if that information proves to be inaccurate.

Please note that pursuant to the applicable laws and regulations, certain information may be exempt from disclosure or INFINOX may be unable to disclose information you request.

10. Cookies and Website Information

INFINOX uses cookies and similar technologies, such as analytics tools, pixels, tags and local storage technologies, on its website and online services. Some of these technologies are strictly necessary to enable our website and platforms to function properly, to provide secure access, and to support core service features. We use strictly necessary cookies on the basis that they are required for the operation and security of our website and services.

We also use optional cookies and similar technologies for analytics, personalisation and advertising purposes. We will only place or use these optional cookies and technologies on your device where you have given your consent through cookie banner, where consent is required by law. You can withdraw or change your cookie preferences at any time through the cookie settings.

Where you consent to analytics cookies, we use the information collected to understand how visitors use our website and services, improve performance, measure the effectiveness of content, and enhance user experience.

Cookie and similar technology information may include identifiers, device and browser information, IP address, pages viewed, actions taken on the website, dates and times of access, and referring website information. Depending on the technology used and your settings, this information may be linked with other information we hold about you.

You can manage cookies through your browser settings. Please note that disabling strictly necessary cookies may affect the operation, security or functionality of parts of our website or services.

11. Information Collected at Our Premises

Visitor Information

INFINOX collects information about visitors to our premises. INFINOX may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. If you have an accident at our premises, this may include a record of your accident.

CCTV

INFINOX may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes.

INFINOX uses this information as necessary for our legitimate interests in administering your visit, ensuring site security and visitor safety.

12. Storage of Information

INFINOX's office headquarters are based in the UK. However, where required to perform our contract with you or for our wider business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside the UK.

You acknowledge and agree that your personal information may be transferred within or outside the UK. You agree that we will be permitted, if so required, to furnish relevant information concerning you or your Trading Account(s) to any person who we believe to be seeking a reference or credit reference in good faith. The information we share may affect your ability to obtain credit. Please note that INFINOX only transfers personal information to organisations outside the UK if INFINOX has assessed the organisation as having appropriate controls and safeguards in place to protect your personal data.

Some countries or organisations outside of the UK which we may transfer your information will have an 'adequacy decision' in place, meaning that under the UK GDPR and the Data Protection Act 2018, the UK considers them to have an adequate data protection regime in place. Data may be transferred to, stored and

processed in countries which do not offer 'adequate protection' for any purpose related to the operation of your Account. Such purposes include the processing of instructions and generation of confirmations, the operation of control systems; the operation of management information systems; the carrying out of such credit and identity checks as we may deem necessary or desirable; and allowing staff who share responsibility for managing your relationship from other offices to view information about you. You agree that where it is necessary for the provision of these or other Services to you, we may transfer your information to persons who provide services to INFINOX, including where those persons may be outside the UK. You consent to INFINOX's processing and disclosing such information in accordance with INFINOX's Privacy Policy published on INFINOX's website(s), as may be updated from time to time.

If we transfer data to countries or organisations outside of the UK which the UK does not consider having an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by a data protection authority) are put in place where required. To obtain more details of these safeguards, please contact us.

13. Data Security

INFINOX takes security very seriously and adopts industry and information security best practices to protect your personal information and ensure it is not accessed by unauthorised persons. Measures include encryption of data during transmission, strong authentication mechanisms and secure access to machines and data.

INFINOX has put in place appropriate internal security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, INFINOX limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on INFINOX's instructions and they are subject to a duty of confidentiality.

INFINOX has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

14. Retention of Information

General Retention Policy

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Generally, INFINOX will keep your information for a period of five (5) years. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Legal Claims

Where INFINOX considers there to be a risk to defend or bring legal claims, INFINOX may retain your personal information as necessary for a legitimate interests in ensuring that INFINOX can properly bring or defend legal claims. INFINOX may also need to share this information with insurers or legal advisers. How long Infinox keeps this information for will depend on the nature of the claim and how long INFINOX considers there to be a risk that we will need to defend or bring a claim.

In some circumstances INFINOX may anonymise your personal information so that it can no longer be associated with you, in which case INFINOX may use such information without further notice to you.

15. Amendments to Policy

INFINOX may make changes to this Privacy Policy from time to time for any reason and will notify you of such changes by posting an updated version of this policy on this website or where appropriate, by email.

You are responsible for regularly reviewing this Privacy Policy and if you use this website or other service we provide to you after any changes are published, any such use shall constitute your agreement to those changes.