

# STEEPLE PRIVACY POLICY

Last Updated: 1 July 2025

This privacy policy (**the “Policy”**) explains how the Streple copy trading solutions collect, use and disclose personal information through its websites, mobile applications, and other online products and services that link to this Policy, including any of the products and services detailed in the following paragraph (**collectively, the “Services”**) or when you otherwise interact with us.

The Services include providing:

- (a) the Streple social trading platform for copy trading which users can sign up for an account with
- (b) any other site, web platform, mobile application or other service facilitated by Streple (any account described in (a) being a “Streple Account” for this Policy).

**We encourage you to read the Policy carefully as it forms part of the relevant Streple terms and conditions, terms of business, agreement with you and/or terms of use.**

Suppose you accept and agree to this Policy on behalf of a company or other legal entity. In that case, you represent that you have the authority to bind that company or other legal entity to the Privacy Policy and, in such event, “you” and “your” will refer and apply to that company or other legal entity.

## **Application of this Policy**

For applicable state and/or international data protection laws, the respective Entity to which Streple is licensed is the “controller” of personal information collected through Streple services platform, other Streple entities’ websites, widgets, mobile applications, and is the company to contact if you have questions about the use of your personal information.

The Policy also applies to personal data about each authorised representative of a client and about other persons or entities where this personal data is collected in the course of providing the Services (such as directors of corporate clients).

## **Collection of Information**

### **Information You Provide to Us**

We collect information you provide directly to us. For example, we collect information when you create a Streple Account, participate in any interactive features of the copy trading services, fill out a form, participate in a contest or promotion, make a purchase, communicate with us via third party social media sites, request customer support, or otherwise communicate with us.

### **When You Sign Up or Register for a Streple Account or Services**

If you sign up for a Streple Account, we will collect basic information about you, including your name, email address and telephone number. You may provide this information to us directly, or by signing in to your account/service with a third party, including, without limitation, Facebook or Google. We will use the information that we collect about you to:

- (i) Create and maintain your Streple Account.
- (ii) Allow you to log in to Streple.
- (iii) Contact you about your Streple Account and/or our Services (this may include marketing emails).

### **When You Provide Information to Build Your Profile**

Once you have created a Streple Account, we will ask you to provide additional information to allow you to use certain functions. We will ask you to provide a copy of an identification document, such as a passport, residency permit, or national identity card, a utility bill, and other documents as may be required by us to comply with our regulatory obligations and verify your identity. Further details about the identification process can be found in the relevant Streple terms and conditions.

Please note that if you choose to provide additional information about yourself to complete your “Account Profile”, then the information we ask for may include your gender, date of birth, place of birth, addresses, nationality, social security number (or other government issued identification number), citizenship and residency status, and information about your experience trading, education, source of income, investment aims and risk appetite, occupation, employer and employment position, income, investment portfolio, total cash and liquid assets and other details or questions as may be required in the Profile creation and we may amend this process from time to time.

Although it is optional, you must provide further information to proceed with certain features. This is for legal and regulatory reasons.

We will use the information you provide in your Profile to:

- (i) Verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including **KYC, CDD, EDD, AML, fraud, sanctions and politically exposed person (PEP) compliance measures**;
- (ii) Contact you on matters related to your Streple Account, including to request any additional information or documentation;
- (iii) Provide you with notices related to your Streple Account, general updates, market updates, and other marketing materials, including about the Services offered by Streple;
- (iv) Tailor the products and services offered through the platform to you, including performing any suitability or appropriateness assessments for using our services and/or products.
- (v) Assess your credit risk;
- (vi) Assess your risk score according to parameters determined by Streple;
- (vi) Assess whether you qualify as a pro trader, intermediate, beginner or other specific category of client;
- (viii) Maintain administrative records relating to our business;
- (ix) Set up security measures to secure your account, including carrying out **multi-factor authentication (“MFA”)**; and
- (x) Provide the services.

You can update your Profile any time by visiting the “**Account**” page in the Settings menu when logged into your Streple Account. We recommend you update your Profile regularly to ensure that Streple services are appropriate for your current circumstances. You further agree to update such information upon Streple’s request, if Streple considers the information provided untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and that you are responsible for any damages or losses resulting from any inaccuracies, including the inappropriateness of our Services to your Profile. You do not have to complete your profile and therefore do not have to provide the information; however, if you choose not to, we will be unable to offer Streple’s full functionality to you.

### **When You Contact Us**

If you contact us by telephone, email, post or use another function offered by Streple, such as the chat feature, we will collect any information about the communication and any additional information that you choose to give us. We will use this information to review, investigate and respond to any comment or question that you may raise. Please note that we record and retain all telephone calls and other communication with us and may use them in our dealings with you, including any dispute resolution or legal proceedings.

### **When a Streple User Invites You to Use Streple**

Streple users can invite their contacts to sign up for an account with us. We only collect the email addresses of individuals that a user chooses to invite to join Streple. Streple only uses the email addresses for sending an invitation to the individual at the request of the existing Streple user.

## Information About Your Use of the Streple Services

### Usage and Automatically Collected Information

When you access or use our Services, we automatically collect information about you (the type of information depends on the Site you are using), including:

- 1. Financial Information:** We collect financial information related to your use of the Services, including information you provide or that we get from public sources.
- 2. Log Information:** We collect log information about your use of the Services, including the browser, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.
- 3. Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- 4. Activities on the platform:** We collect records of activities on the platform, including any content you post, your Streple Account details, the time, value and currency of any copy trading activity.
- 5. Location Information:** According to your device permissions, we may collect information about the Geo-location of your device.
- 6. Information Collected by Cookies and Other Tracking Technologies:** We use different technologies to collect information, including cookies and web beacons. You can find out more about Streple's use of cookies and similar technologies in our Cookie Policy.

### Information We Collect from Other Sources

We may collect personal information about you from third-party entities when we seek to verify your identity as part of our regulatory requirements. This may include identity verification agencies. We may also collect information about you from third parties, when you use or connect to Streple by or through a third-party platform, such as Facebook or another site, you allow us to access and/or collect certain information from your third party platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third-party platform for their use.

Some of the information we collect from you at the installation of the mobile app will be shared by us with vendors and other service providers who are engaged by, or working with, us in connection with operating and analysing the copy trading services we provide to you.

### Unsolicited Information

If you provide us with personal information that we have not requested, we will retain the information that we are entitled to or required to hold, based on the services provided. If this additional information exceeds our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to keep, then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

### Use of Information

We use the information we collect to provide, maintain, and improve our services, such as to administer, verify and maintain your account, to provide the services you request, and customise your experience with us. We also use the information we collect to:

- (a) Carry out our obligations owed to you;
- (b) Comply with our regulatory and other legal obligations;
- (c) Monitor/access any content you post;
- (d) Administer transactions including deposits, chargebacks and payments;
- (e) Monitor trading activity on the Streple platform, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities;

- (f) Determine whether a payment method is being abused;
  - (g) Compile statistical analysis of the pages of our platform and websites;
  - (h) Monitor and copy trading activities and our business;
  - (i) Investigate and manage enquiries, disputes and legal proceedings, and comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;
  - (j) Provide information about you and your trading with us to credit reference/reporting agencies;
  - (k) Participate in crime prevention, legal and regulatory compliance, and assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement;
  - (l) Develop and market other products and services; and
- novate, transfer or assign any of the rights or liabilities of the Streple.

## **Sharing of Information**

We will not share the personal information we hold about you except in the following circumstances:

- (a) between and among the Enet Technologies, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
  - (b) with professional advisors, vendors, consultants, and other service providers, such as payment service providers, IT hosting companies, banks, other financial institutions and credit reporting/reference agencies who need access to such information to carry out work on our behalf;
  - (c) in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of Enet Technologies by another company;
  - (d) disclosure according to, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
  - (e) if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of Streple or others; or
- where we have your consent.

## **Social Sharing Features**

If you have elected to use one of our applications provided via social networks (such as Facebook, X, etc.), our application will be granted access to your social network account general information which includes your name and username in the social network, profile picture, gender, networks, user ID, list of friends, and any other information you have permitted to be shared depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

## **Advertising and Analytics Services Provided by Others**

We may allow others to provide analytics services and serve advertisements about our products and services on our behalf across the web and in mobile applications. This may involve cookies and other technologies to collect information about your use of the copy trading services. This information may be used by Streple to analyse and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our services, and better understand your online activity in connection with the services. Please refer to our **Cookie Policy** for more information about the cookies involved and the process of consenting or refusing cookies.

## **Your Choices and Rights**

You may have certain rights and protections under the law regarding the processing of your data. For example, you may also have the right to object to, or request that we restrict, certain processing and, in some circumstances, obtain a copy of the personal information in a machine-readable format. There are limits to such rights, and in certain circumstances, we may not be required or able to meet your request, or we may only meet your request in part.

## Legal Basis for Processing

For transparency purposes (where relevant under data protection legislation applicable to our processing of your personal information), we process personal data on the following legal grounds:

**1. Entering into and Performing the Contract with You:** If you have a Streple Account or have registered on the platform for the services, our legal basis for processing your personal information is that it is necessary for the performance of the relevant Streple's terms and conditions or terms of use, and to provide the requested service to you. Regarding a Streple Account, this includes facilitating access to our platform, processing payments and executing trades.

**2. For other Justifiable Grounds, including Legal Obligation and Legitimate Interests:** We process your personal information where necessary for Streple to comply with legal and regulatory obligations we are under, and also where it is needed for legitimate interests we have in conducting our business (or the legitimate interests of our partners in complying with their legal obligations), balanced against the rights of our customers, like you. These include:

(i) Learning about your interests and preferences to contact you with information that is relevant to you, and helping us target marketing communications and advertisements for our products and services so that they are more relevant to you.

(ii) Using your pseudonymised details to show you advertising for our products and services on social media platforms, such as Facebook or via other third-party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your data.

(iii) Analysing and continually improving the Streple copy trading platform and the services, and helping us pilot test versions of the applications internally to develop new features and ensure the efficient running of Streple's services.

(vi) Detecting and reducing fraud and credit risk.

## Data Subject Requests

You may have the right to access personal data we hold about you and ask that your data be updated, corrected, transferred, or erased. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you can log into your account or contact us through the channels on our website. Alternatively, you may also reach us by email at [privacy@streple.com](mailto:privacy@streple.com). If you wish to delete or deactivate your account, please note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

## Questions or Complaints

If you are interested in exercising any of these rights (or confirming if they apply to our processing of your data), you can log into your account or contact us. If you have a concern about our processing of your data that we are not able to resolve, you may have the right to complain to the relevant data protection supervisory authority where you reside. As noted above, even where such rights apply, they are subject to limits. This means that, in certain circumstances, we may not be required or able to meet your request, or we may only meet your request in part.

## Promotional Communications

You may opt out of receiving promotional emails or text messages from Streple by following the instructions in those emails or text messages or by visiting the "Notifications" tab in the "Settings" menu on our platform. If you opt out, we may still send you non-promotional emails, such as service messages about your Streple Account or our ongoing business relationship.

## Mobile Push Notifications/Alerts

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

## Streple Social Trading Platform

Streple provides a real-time social trading platform which integrates rich community and social characteristics into the trading platform. As part of the Streple traders' network, traders who choose to be part of the community share their strategies and performance with the community. The amount traded is never publicly disclosed, and all these traders have expressly agreed to be part of the network and share their strategies and performance.

Downloading, installing and accessing the Streple services relating to the trading platform constitutes your agreement and acknowledgment that the following information and content shall be considered non-confidential and non-proprietary information (other than your data as described below), collectively, the **"Content"** and shall be publicly shown on the Site: your username and full name, your picture/avatar (if provided), your state of residency, gender, networks, list of users who follow you, users who copy you, stats related to your trades etc., list of users you follow or copy, and any network status/posts/blogs and any other content options that enable our users to interact amongst themselves, including without limitation content and information you post on the Streple community, comments, feedback, postings, "likes", blogs and/or all information that you provide to us via the platform, and/or by email, chat, fax or telephone and/or any other means.

## Retention of Personal Information

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes for which it was collected, as well as the requirements of any applicable law or regulation. For example, if you are invited to use Streple by another user, we will store the personal information about you provided by such other user for of six months to send an invitation to you by email.

If you have a Streple Account, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations applicable to us.

## Security and Integrity of Information

We protect your personal information by using data security technology and tools such as firewalls and data encryption. We also require that you use a personal username and password every time you access your account online. As set out in the relevant Streple terms and conditions. You must not share your password with anyone else. We recommend that you do not reuse a password previously used by you for other platforms/services. We strongly encourage you to activate **Two Factor Authentication ("2FA")** in your account. 2FA requires you to enter a verification code sent to you to access your account.

We restrict access to personal information at our offices so that only officers and/or employees with a legitimate business purpose and access privileges can access it.

## Minors

Streple copy trading services are not available for users under the age of 18 (or the age of legal consent for the jurisdiction the user is located in) (a **"Minor"**). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services or provide any personal information to us.

If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a Minor has shared any information with us, please contact us at [streple.com/customer-service/](https://streple.com/customer-service/).

## Changes to this Privacy Policy

The Policy will be reviewed and updated from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate in light of any changes in law, technology and the business environment.

Any personal information held will be governed by our most current Policy. Please refer back to the Policy regularly.

## **Links**

The Site may include links to other websites on the internet. We are not responsible for the content of these sites or any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such websites. Our terms of use and our Privacy Policy apply only to information collected by us under this Policy.

## **Contact Us**

Should you have any questions regarding the Policy, please contact our customer support and open a ticket via [streple.com](https://streple.com), and please include your full name and email address so we are able to handle your query properly. We may require that you provide additional information to verify your identity before allowing you to exercise certain rights outlined above.