



# Privacy Notice

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# STRYK APP PRIVACY NOTICE

## 1. Introduction

BUX Europe Limited and BUX Financial Services Limited (hereafter “the companies” or “we”) are a part of the BUX group of companies (hereafter “the Group”) and offer financial services to investors and traders across Europe through the app, Stryk. More specifically BUX Europe Limited offers its services to EU residents, while BUX Financial Services Limited to non EU residents.

The Companies value and protect the privacy and confidentiality of our users’ and clients’ personal data that we use in connection with our mobile apps and websites.

This Privacy Notice describes how the companies handle your personal data as data controllers. We collect, use, disclose and otherwise process your personal data where this is necessary for the purposes identified in this Privacy Notice, and only where permitted by the EU General Data Protection Regulation (GDPR), the UK GDPR, and other local data protection laws (the Data Protection Rules). We treat your personal data with the utmost care and security. Please read this Privacy Notice carefully to understand how we process your personal data.

In this Privacy Notice, we use several terms that have a specific meaning under the Data Protection Rules (such as “personal data”, “processing” and “data controller”). Section 10 of this Privacy Notice contains an overview of these defined terms.

## 2. Identity of the Data Controllers and their Contact Details

Each company of the BUX Group acts as the data controller for the products and services it provides to users and clients. You may find which company is responsible for the processing of your personal data in the respective Terms & Conditions document of the Stryk app. The

companies have also appointed Data Protection Officers whom you may contact using the designated email address. The contact details of our companies are:

- i) BUX Financial Services Limited address: 3rd Floor, Canvas Building, 35 Luke Street, London, EC2A 4LH, United Kingdom, Data Protection Officer email: [dpo@buxmarkets.com](mailto:dpo@buxmarkets.com)
- ii) BUX Europe Limited address: Franklin Roosevelt Avenue 67, Lima Carna Building, Office 101, 3011 Limassol, Cyprus, Data Protection Officer email: [dpo@buxeurope.eu](mailto:dpo@buxeurope.eu)

### 3. Personal Data that We Process

We collect and process the following personal data:

**(a) Device information** ► information about the device you use, including your IP address and its operating system, platform, and version.

**(b) Your contact information** ► If you want to open an account with us, you have to register your email address that we will process. Additionally, you are able, but not required, to link your email address to your account through the settings of our app.

**(c) Your username** ► your public username that is visible to other users of our mobile apps and which you are using to log in to your account to access our apps and platforms.

**(d) Device ID** ► we process the unique ID number of your device.

**(e) Usage Details** ► the date and time you use our mobile apps, usage patterns, traffic data and logs.

**(f) Log-in details from external parties** ► Log-in details from third parties to facilitate log-in into our apps, including Facebook ID, Apple ID and Google ID.

**(g) Other personal information that you share with us** ► any other information that you share with us and any communication that we have through your use of our apps, such as chat messages, emails, correspondence, and telephone calls which are recorded and retained for as long as it is obligatory by law.

**(h) Your individual details** ► name, address incl. proof of address, date of birth, contact details (e.g., email address, telephone number), nationality and gender.

**(i) Your identification details** ► identification numbers issued by government bodies or agencies (e.g., depending on the country you are in, social security, citizen service or national insurance number, passport number, ID number, tax identification number, driver's licence number), a copy of your identification document that includes your photograph.

**(j) Transactions and financial data** ► credit card details, bank account details, and details of transactions you carry out through the Stryk application and of the fulfilment of any orders.

**(k) Information on your trading knowledge and experience** ► information gathered through various questions asked during the client acceptance process in the Stryk app.

**(l) Personal data relating to criminal convictions and offences** ► The companies will, under certain circumstances, collect personal data relating to your criminal convictions, and criminal offences (including, but not limited to fraud).

The data processing under (k) and (l) as well as the decisions about your eligibility and categorisation as a client, may be performed by automated algorithmic tools.

The categories specified under (a) to (g) above are always collected when using our app. Categories (h) to (l) are collected when opening a trading account with either of the Companies.

## 4. How we process and disclose your personal data

### General information

In this section, we set out the purposes for which we use personal data, explain how we share your personal data, and identify the “legal grounds” on which we rely to process the personal data.

These “legal grounds” are outlined in the GDPR and the UK GDPR and are used as justifications for any lawful data processing. The table below provides a description of the legal grounds that the Companies rely on:

<b>For processing personal data and special categories of personal data</b>	
<b>Legal ground</b>	<b>Details</b>
(1) Performance of our contract with you	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
(2) Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
(3) For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require the protection of personal data. These legitimate interests are set out next to each purpose.
<b>For processing special categories of personal data</b>	

(4) Your explicit consent	<p>You have given your explicit consent to the processing of those personal data for one or more specified purposes.</p> <p>You are free to withdraw your consent, by contacting our Data Protection Contact. However, withdrawal of this consent may impact our ability to provide the services.</p>
(5) For legal claims	<p>Processing is necessary for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity.</p>

## For what purposes do we use your personal data and what legal bases do we use to justify such use?

The purposes for using your personal data and the legal basis which justify such processing are:

**(a) To provide our app to you ►** we require your personal data to be able to provide our services to you. This includes the use of our trading apps and platforms, the execution of transactions upon your request, the management of our business relationship and all communications related thereto.

• **Use justification:** (1) performance of our contract with you; and (2) compliance with a legal obligation.

**(b) For security purposes, to analyse and continuously improve our app ►** we may use personal data for testing and improving our app, the security thereof and for further tailoring our apps and platforms to our users' needs (including by estimating and measuring usage patterns). Only in very exceptional circumstances will we use personal data for testing purposes and if this is necessary, always in a closed and secure environment. We will also use your personal data to inform you when updates to our app are available.

- **Use justification:** (1) performance of our contract with you; and (3) for our legitimate business interest (to enable us to ensure the security of our systems and further improve our mobile apps and platforms).

**(c) For regulatory purposes**

- **Use justification:** (1) performance of our contract performance; and (2) compliance with a legal obligation.

**(d) To provide payment services providers (e.g., Adyen) with the relevant personal data that would enable you to deposit money in your Stryk trading account.**

- **Use justification:** (1) performance of our contract performance; and (2) compliance with a legal obligation.

**(e) For marketing our products and services** ► we may use personal data to contact you by email and send you push notifications in our app for marketing purposes. We may also send you marketing communications through social media platforms, provided that you have given these platforms your consent to receive personalised advertisements.

We may share your personal data with other BUX group entities for marketing purposes in order to conduct cross – promotions of BUX products and services and/or for any other operational or administrative reasons. During the registration process, you have been offered the choice to refuse such marketing. In addition, you may opt out at any time from any of these marketing communications by following the instructions included in them or through the user settings of our app.

We will only market our own products and services to you and will not provide your contact details to any third party for marketing purposes with the exception of third parties processing personal data on our behalf (as our data processors), such as Facebook, Snapchat, Google and Twitter.

- **Use justification:** (3) for our legitimate business interests (to enable us to promote our services and products).

**(f) For marketing our products and services to potential new users** ► we may disclose your email address or device ID (and no other personal data) to the social media platforms, to enable these platforms to approach potential new users by creating a profile based on the personal data

those platforms have collected from you. These platforms will act as data controllers and will only be able to use the personal data included in your social media profile and the profiles of the potential new users based on explicit consent given by you to the social media platforms. Please be aware that the social media platforms mentioned on the above-mentioned list may change from time to time.

- **Use justification:** (3) for our legitimate business interests (to enable us to promote our services and products).

**(g) To defend our legitimate interests and to change our business structure** ► We may disclose personal data in connection with legal proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators, and third-party litigants (these third parties are not data processors on behalf of the Companies and will process personal data for their own purposes).

We may also provide your personal data to any potential acquirer or investor in any part of our business for the purpose of that acquisition or investment.

- **Use justification:** (1) performance of our contract with your contract performance; (3) legitimate interests (to enable us to cooperate with law enforcement and regulators and to allow us to change our business); and (5) for legal claims.

**(h) To conduct certain checks on you, that we are obliged to perform for customer due diligence and anti-fraud purposes before the establishment and/or during our business relationship.**

► we and other organisations engaged by us for this purpose may access and use your personal data to conduct credit checks and checks to prevent fraud, money laundering, and terrorist financing and to establish whether you are a politically exposed person (PEP). If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to the relevant authorities including credit reference and fraud prevention agencies.

Any such deceitful information will be recorded and potentially accessed and used by national or European law enforcement agencies.

- **Use justification:** (2) compliance with a legal obligation; (3) for our legitimate business interests (to assist in the prevention of crime and fraud).



## **Do we disclose your personal data to others and where is data being stored?**

We store your personal data on our IT systems located in the European Economic Area (EEA). The Companies engage various data processors for the processing of your personal data on our behalf, including IT service providers and other business service providers.

We have contracts in place with our data processors, which means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation (unless legally required to do so) apart from us. They will hold it securely and retain it for the period that we instruct.

We may be legally required to disclose your personal data in response to requests from regulators and law enforcement or security agencies, in which case these regulators and law enforcement or security agencies will be acting as data controllers as well. We will always assess the legitimacy of such requests before disclosing any personal data and will only disclose the personal data required to comply with such a request.

We also disclose your email address or device ID to the social media platforms, to allow them to market our mobile apps to potentially interested social media users, as described under (e) above.

## **From what sources do we collect your personal data?**

We may obtain personal data from various sources, including:

- You directly through our Stryk mobile application and website; and
- Third-party companies like IVXS UK Limited, trading as Comply Advantage, which we engage in for performing background checks that form part of our acceptance process.

## **5. Protection of your personal data**

The Companies have implemented appropriate technical and organisational measures to secure the processing of personal data. These safeguards will vary depending on the sensitivity, format, location, amount, distribution, and storage of the personal data, and include measures designed to keep personal data protected from unauthorised access. If appropriate, these safeguards

include the encryption of communications via SSL, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols.

We grant access only to the members of our personnel and third parties that have legitimate, relevant business purposes to process your personal data.

All our staff members, contractors and third parties are bound to confidentiality and have limited access only to the personal information that is necessary for the performance of their responsibilities and tasks.

We have information security policies and systems in place which are frequently audited. We take the security of our IT infrastructure very seriously.

## **6. Limiting Collection and Retention**

We collect, use, disclose and otherwise process the personal data that is only necessary for the purposes identified in this Privacy Notice or as permitted by the Data Protection Rules. If we plan to process your personal data for a purpose different than those mentioned above, we will notify you and, if required, ask for your prior consent.

We retain your personal data for as long as you access and make use of our app and website. In any case, we will retain your personal data and keep your profile active until you, or under exceptional circumstances, end our customer relationship with you. After our customer relationship with you has ended, we will retain your personal data for a limited period of time.

Our retention periods for personal data are based on business needs and legal requirements. We retain personal data for as long as is necessary for the processing purpose(s) for which the personal data was collected, and any other permissible, related purpose. For example, we retain your personal data after you have closed your account where necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, or fulfil your request to “unsubscribe” from further messages from us.

We will retain de-personalized (aggregated) information after your account has been closed, but such information will no longer allow us to identify you. Information that you have shared with other users of our app (e.g., updates or group posts) will remain visible to others after you have

ceased using our apps. Group content associated with closed accounts will show the user at the source. Your profile may continue to be displayed in other companies' services (e.g., search engine results).

## 7. Cross-Border Transfer of Personal Data

We may transfer personal data to, or permit access to personal data from, countries outside the European Economic Area (EEA). These countries' data protection laws do not always offer the same level of protection for personal data as offered in the EEA. We will, in all circumstances, safeguard personal data as set out in this Privacy Notice.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. The Data Protection Rules allow the Companies to freely transfer personal data to such countries. If we transfer personal data to other countries outside the EEA, we will establish legal grounds justifying such transfer, such as model contractual clauses, individuals' consent, or other legal grounds permitted by applicable legal requirements.

You can request additional information about the specific safeguards applied to the export of personal data from our data protection officers.

## 8. Cookie Policy

Our websites use cookies which are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow it) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

You can find an overview of the cookies that We use in the table below:

Cookie type	Purpose
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Functional cookies	We use these functional cookies to help us remember certain actions you undertake on our website and platform. We also use these cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.
Analytic cookies	These cookies help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services.
Third-party cookies	We use the Demographics Interests Reporting of Google. We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other service functions as they relate to our website, but only if you have consented to these third-party cookies. Please take a look at the Google advertising requirements on <a href="https://support.google.com/adwordspolicy/answer/1316548?hl=en">https://support.google.com/adwordspolicy/answer/1316548?hl=en</a>

You can choose to disable all cookies. You can do this through your browser settings. Since every browser is a little different, look at your browser’s Help Menu to learn the correct way to modify your cookies. You can further set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt-out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

If you do not consent to the use of cookies or turn cookies off, some of the features that make your site experience more efficient may not function properly.

We honour Do Not Track signals and do not track, deploy or use cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

For more information on the use of cookies at our Stryk website, you may consult our “Cookie Policy”.

## 9. Your Rights and Complaints

We strive to maintain personal data that is accurate, complete, and current. You should contact our data protection officer using the contact details set out in section 2 of this Privacy Notice.

Under the GDPR and the UK GDPR you have certain rights in relation to your personal data. These rights are described below. If you wish to exercise one of these rights, please contact our data protection officer using the contact details set out in section 2 of this Privacy Notice. To ensure an efficient follow-up, we kindly ask you to specify your request and indicate to which personal data your request relates.

You have the following rights (please be aware that certain exceptions apply to the exercise of these rights and so you may not be able to exercise these in all situations):

(a) Right of access: you have the right to obtain confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, to obtain a copy of the personal data we maintain about you.

(b) Rectification: you may ask us to rectify any inaccurate personal data that we process.

(c) Erasure: you may ask us to delete personal data that we no longer have legal ground to process.

(d) Restriction: you may ask us to mark certain personal data as restricted whilst complaints are resolved and ask for restriction of processing under certain other circumstances.

(e) Portability: You can ask us to transmit the personal data that you have provided to us, and we still hold about you to a third party electronically.

In addition, under certain conditions, you have the right to:

- where processing is based on consent, withdraw the consent.

- object to any processing of personal data that the Companies justify on the “legitimate interests” legal ground unless our reasons for undertaking that processing outweigh any prejudice to the individual’s privacy rights; and
- object to direct marketing (including any profiling for such purposes) at any time.

These rights are subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege).

We will respond to most requests within one month.

If you are not satisfied with our use of your personal data or our response to any exercise of these rights, we kindly ask you to first contact our Data Protection Officer, using the contact details set out in section 2 of this Privacy Notice.

In addition, you always have the right to complain to the competent data protection authority depending on the country you live in, as it is explained in Chapter 1.

**For the United Kingdom:**

Information Commissioner’s Office at <https://ico.org.uk/global/contact-us/> or at <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

**For Cyprus:**

Commissioner for Personal Data Protection of Cyprus address Iasonos 1, 1082 Nicosia, P.O.Box 23378, 1682 Nicosia, Cyprus, email: [commissionerdataprotection.gov.cy](mailto:commissionerdataprotection.gov.cy)

## **10. Changes to the Privacy Notice**

This Privacy Notice is subject to change at any time. If this Privacy Notice changes, we will update the date it was last changed and publish the revised Privacy Notice on our websites and in our mobile applications. We advise all users to regularly check for updates. If we change the purposes for processing your personal data, we will notify you accordingly as stated in Chapter 6.

# 11. Terminology

Under the Data Protection Rules (including, but not limited to, the GDPR and the UK GDPR), the following terms have a defined meaning as set out in the table below:

GDPR	The European General Data Protection Regulation (EU) 2016/679. The GDPR is applicable in all EU member states as of 25 May 2018. Also, for UK residents the UK GDPR and other relevant legislation, are applicable
Personal data	Any information relating to an identified or identifiable natural person (e.g., a person whose identity can be established reasonably without disproportionate effort by means of name, address, and date of birth). By way of example but not limitation, any contact information, emails, IP addresses, user profiles, and transaction details.
Processing (of personal data)	Any operation or any set of operations concerning personal data, including in any case the collection, recording, organisation, storage, updating or modification, retrieval, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, erasure or destruction of personal data.
Data controller	The legal person, administrative body or any other entity which, alone or in conjunction with others, determines the purpose of and means for the processing of personal data.

Data processor	The person or body which processes personal data on behalf of the data controller, without being subject to the data controller's direct control.
Special categories of personal data	Any personal data that provides information on persons' religious or philosophical beliefs, race, political opinions, health, sexual life or membership of trade unions, or, for the purpose of this privacy statement, criminal convictions or offences.