

PRIVACY POLICY

Last updated: 10.3.2026

GENERAL (WHO IS THIS PRIVACY POLICY FOR?)

This Privacy Policy explains how ELEONEX DOO BEOGRAD (“ELEONEX”, “Company”, “we”, “us”, or “our”), in accordance with the Law on Personal Data Protection of the Republic of Serbia and, where applicable, the General Data Protection Regulation (EU) 2016/679 (“GDPR”), collects, uses, stores, and protects personal data. If you are located in the European Union, this Privacy Policy applies to you pursuant to Article 3 GDPR.

- **Visitors** of our website <https://eleonex.com/> („Website“)
- **Users of our Services** (as explained in our Terms and Conditions available on our Website (the „Services“))
- **Clients and customers** (including representatives of legal entities)
- **Business partners and suppliers** (this may include shareholders, contact persons, lawyers for the counterparties, or other individuals whose data need to be processed for ELEONEX’s provision of services or exercising rights and obligations);
- **Any individuals who communicate with us or whose personal data we process in the course of our business activities.**

All information based on which we can directly or indirectly identify you or which is related to you is considered „Personal Data“ in terms of this Policy.

This Website may contain links to third-party websites. Please note that these websites are not under our control and are governed by their own privacy policies. ELEONEX is not responsible for the privacy protection practices of any such website.

References in this Privacy Policy to “you” or “your” are references to individuals whose personal data ELEONEX processes, as explained above.

ELEONEX is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how ELEONEX collects, uses, and discloses your personal data.

This Privacy Policy is part of and should be read in conjunction with our Terms and Conditions, which, among other relevant information, define a list of countries and territories in which ELEONEX does not offer its goods or services. This list forms an integral part of the terms governing the availability of ELEONEX’s offerings and may include, in addition to jurisdictions subject to international sanctions, those excluded by ELEONEX at its sole discretion for internal policy, strategic, or other reasons.

By accessing and using the Website or the Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Privacy Policy and Terms of Conditions, available on our website.

This Privacy Policy provides a general overview of the personal data processing and protection system implemented by the Company. Accordingly, as needed and particularly upon your request, the Company can provide additional information regarding the processing of your personal data.

The Company reserves the right to amend and supplement this Privacy Policy as necessary, especially in the event of changes to relevant regulations and/or methods of processing and data protection mechanisms by the Company. We kindly ask that you check the last update date of this Privacy Policy each time you review it.

WHO IS THE DATA CONTROLLER?

The controller of your personal data is the company ELEONEX DOO BEOGRAD, with its registered office in Belgrade, Republic of Serbia, 6 Kralja Milana Street, register number: 22097318, TIN: 114965026, registered in the Serbian Business Register Agency (hereinafter: the “our **Company**”, ELEONEX, “we” or “Controller”).

Contact details:

Email: support@eleonex.com

Mailing address: Kralja Milana 6/1

WHAT IS THE PURPOSE OF DATA PROCESSING?

We may use your personal data for the following purposes:

- **Website visitors, registration, and user account**

We may process your personal data in order to provide you, at your request or initiative by accessing our website, with services and enable the use of the Website and its contents. We will process personal data provided by you through filling out the registration form available on the Website (hereinafter: Registration Form), for the purpose of contacting you, you’re creating a user account and communicating regarding potential use of our services, access to the relevant service platform, monitoring data about simulated transactions, services usage and services activities information, issuance of a certificate of completion of the Challenge (made through simulated trading account using virtual funds), communication about potential eligibility for future opportunities (we may personalize content and offers to you), to carry out any KYC or AML procedures, to protect our and third parties’ interests, rights and assets which may include detecting, investigating and preventing fraudulent transactions and/or unauthorized or illegal activities, as well as initiation or exercise or defense of legal claims and preventing them, and/or to fulfill our legal or regulatory requirements.

- **Customer support and communication**

Your data may be processed when accessing our technical / customer support services.

- **Preparation, conclusion, and execution of a contract with you**

Finally, if the process of informing and communicating about potential specific services leads to negotiations for concluding a contract and ultimately the conclusion of the contract, the processing of personal data will be carried out for the purpose of taking actions at your request before entering into the contract, as well as for the performance of the contract.

WHAT IS THE LEGAL BASIS FOR DATA PROCESSING?

We will not process your Personal Data unless there is a legal basis for such processing. Depending on the purpose of processing, one or more legal bases for data processing outlined here may be applied.

Consent: Where processing is based on your consent (including marketing communications and non-essential cookies such as analytics and marketing cookies), consent is obtained through clear affirmative action (e.g., unticked checkbox or cookie banner selection). You may withdraw consent at any time without affecting the lawfulness of processing before withdrawal.

Contractual necessity (processing for the purpose of preparing, concluding, and performing the contract) – where it is necessary for the performance of a contract with you or to take steps at your request before entering into such a contract. Upon expiration of the contract concluded with you, we process personal information for a limited period of time, for purposes of exercising and protecting our rights and obligations that may arise therefrom.

Legitimate interests: where it is necessary for our legitimate interests, provided that your fundamental rights do not override such interests. Before we process your data on this basis, we consider and balance any potential impact on your fundamental rights and freedoms. Processing is necessary for the provision of the services, or any other legitimate interests pursued by the Company or by a third party (e.g., to improve our Services, we will use the data collected during your use of the Services to enhance our Website or Services, or for the exercise or defense of legal claims, or to provide customer support and communication).

Legal obligations: where it is necessary for compliance with a legal obligation to which we are subject.

WHAT PERSONAL DATA MAY WE COLLECT?

Your personal data is collected directly from you related to your use of our services, as follows:

When using the registration form on our website and/or expressing interest in initiating or furthering cooperation with the Company – we may collect and further process data that you provide to us yourself, data that you provide filling the Registration Form on the Website, data that you provide and enter into your user account, data on services and type of cooperation you are interested in, data relevant for conclusion of the contract, login and logout information when using the services, account settings, value of the fictitious capital, your account currency, business strategy or when you communicate with us through customer support or social networks. In particular, these data are:

- **Identification and contact data** (which include your identification and contact information: name, surname, telephone number, e-mail address, postal address, date of birth, user name, and password)
- **Tax and business identification data:** tax registration number and business identification number, in case you are an entrepreneur, your tax residency
- **Bank details and other relevant payment data**
- **Content of your communication with us**, including information about potential or established cooperation and provision of the services, negotiations for concluding a contract, and ultimately the conclusion of the contract, and any claims.
- **Processing of Personal Data for KYC, AML/CTF Compliance**, we may require you to provide us with data and documentation relevant for compliance with AML applicable legal requirements

and best practices (such as: full name, birth date, residential address, nationality, identification number (e.g. passport number or national ID number), a copy of valid identity document, contact information, occupation, any other information necessary to verify identity and comply with legal obligations (we process this data strictly for compliance purposes, and in accordance with applicable data protection laws. Refusal to provide the requested information may prevent us from entering into or continuing a business relationship. We reserve the right to perform various checks at our sole discretion, including but not limited to identity verification, fraud prevention, and reviews of your current or past activity on your Account and within any Challenge (as defined in our Terms and Conditions). Your Registration Data may be used for cybersecurity, anti-fraud measures, anti-money laundering compliance, and account administration. Such information can be verified by us, including through the use of external third-party verification services, in order to validate compliance.

- **Data about the simulated transactions, Services usage, and Services activities information** you have completed (for further details about simulated transactions as services we provide, please refer to our Terms and Conditions available on our Website). These data may include the time of opening and closing the position, the amount of investment, profit and loss, and other data relevant for the evaluation of simulated transactions.

Aggregate Information - We may create statistical analyses in order to improve our services, which will be derived from personal information and user data, but in an aggregated and anonymized form so it does not relate to or identify any individual or any specific user's data.

HOW DO WE OBTAIN YOUR PERSONAL DATA?

We obtain your data mainly through direct interactions with you, but it could also be obtained from other sources, such as third parties and publicly available information. Our methods of data collection encompass:

- **Interactions with you:** you provide personal data to us through our interactions via phone, email, or mail, social media, our website forms, or in person;
- **Third parties:** verification services, particularly to validate compliance;
- **Publicly available sources:** we process your data obtained from publicly available sources, including public registers (such as the business registers agency), business networking sites, or applications like LinkedIn.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We use various technical, organizational, and personnel security measures to protect your personal data from unauthorized access, use, disclosure, alteration, or destruction, in accordance with applicable data protection regulations. The safeguards that we implement include pseudonymizing and encrypting personal data, ensuring continuous confidentiality, integrity, availability, and resilience of processing systems, timely restoring data in case of incidents, and regular testing to assess and enhance the effectiveness of security measures.

DO WE USE COOKIES?

We use cookies and similar tracking technologies to ensure proper website functionality, analyze traffic (e.g., Google Analytics), and deliver marketing content (e.g., Meta Pixel). Strictly necessary cookies are

always active. Analytics and marketing cookies are activated only after you provide explicit consent through our Cookie Consent banner. You may manage or withdraw your consent at any time via the 'Cookie Settings' link available on our website.

WHERE IS THE INFORMATION STORED AND WHO WILL HAVE ACCESS TO THE INFORMATION?

We process your personal data in an encrypted database on computers and other devices.

Only authorized personnel within the Company who need to know such data to perform their activities will have access to your personal data. We will not disclose any of your personal data to third parties, external bodies, or organizations, except as stated below or unless you give us your consent for data transfer, or if there is another legal basis regulated by relevant regulations that permits or requires the transfer of personal data.

Your personal data may also be accessed by a Data Processor who provides the Company with website administration services, simulated trading platforms, data storage, and similar services, to the extent that the processing of personal data is covered by the services provided by the Data Processor. Additionally, we may engage other third-party Data Processors to provide services, and we may share your personal data with such entities, as well as legal, accounting, and other advisors, consultants assisting us. In such cases, the “need-to-know” principle will be applied, and we will enter into a contract or another legally binding document in writing, including electronically, that meets the requirements prescribed by relevant regulations. Each such entity to which personal data is transferred is contractually obligated to protect your personal data in accordance with legal provisions and to process the data exclusively according to our instructions.

We will share your personal data with public authorities, courts, and other persons as required by law or necessary for legal proceedings, on a need-to-know basis.

Your data may be shared with persons who help us provide our services and other third parties:

- trading platform provider, to enable you to perform the simulated trades;
- third parties that provide us with different services related to running our Website and performing our business activity (support services, data security services, IP address information, storage, hosting and cloud service providers, analysis of user experience, research, analytical, technical and diagnostic services, legal and accounting services, consultants, payment system operators and financial institutions, IT companies and system administrators, risk management software providers, CRM provider, KYC provider);
- to protect our rights, property, and interests or those of third parties;
- to comply with and fulfil our legal or regulatory requirements or to comply with a national authority request or a court order;
- to a third party in respect of which you give your consent thereto, as well as in the cases where it is our obligation under the law or under a judicial or any other legally binding decision;
- if we will be subject to an audit or a due diligence process;
- we may share your personal data to entities that control us, entities that are under our control, and/or entities under common control or ownership with us (share within the group), for the purpose of supporting the needs of the group;

- we may share your personal data with our business partners for the opportunity to participate in a separate program, initiative, or collaboration organized by us or one of our official partners;
- if we merge with a third party, sell, assign, or transfer some or all of our business or assets to another entity.

Certain third parties collect personal data for their own purposes as controllers. In such a case, their own rules for the processing of personal data shall apply.

HOW LONG WILL PERSONAL DATA BE RETAINED?

We do not retain personal data longer than necessary to fulfill the purposes for which such personal data were collected, unless specifically required by applicable laws for longer retention periods. Thereafter, the personal data are deleted or anonymized.

We will delete and remove personal data:

- if you withdraw your consent on which the data processing is based, and if there is no other legal basis for processing such data;
- if personal data were unlawfully processed;
- if personal data must be deleted to comply with a legal obligation to which the Company is subject
- in other cases, as provided by relevant regulations.

Deletion of personal data may not be possible to the extent that processing of such data is necessary for compliance with a legal obligation of the Company requiring processing, or for the performance of tasks carried out in the public interest, filing, exercising or defending legal claims, as well as in other cases determined by relevant regulations.

We process personal data for the following periods of time:

1. **Contractual necessity** - processing for the purpose of performing the contract and for the exercise of rights and obligations in connection with the contract, including any complaints, settlement of damage claims or related litigation, personal data is processed for the necessary period of time, but not more than 10 years from the termination of the last contract;
2. **Consent** – if you have given your consent, for the period specified in the consent;
3. **Improvement of services** - for this purpose, we usually process personal data for a maximum period of 6 months;
4. **Legal obligations fulfillment** – for this purpose, we process personal data for the period set out by the relevant legal regulations (usually for a period of 10 years regarding obligations arising from tax regulations).

INTERNATIONAL DATA TRANSFERS

Personal data may be transferred outside the European Economic Area (EEA), including to the Republic of Serbia and to the United States (e.g., Google LLC and Meta Platforms Inc.). Where required, such transfers are safeguarded through Standard Contractual Clauses approved by the European Commission and/or reliance on the EU-U.S. Data Privacy Framework, where applicable.

YOUR RIGHTS PROCESSING

Regarding the processing of personal data, you have the following rights:

1. Right to be informed about the processing of personal data (as provided in this Privacy Policy), including the right to request and receive additional information related to the processing of your personal data.
2. Right to access, i.e., to obtain insight into the personal data we process about you (you can ask us at any time to send you a confirmation as to whether or not your personal data is being processed).
3. Right to obtain a copy of the personal data we process about you (please note that the first copy is free of charge, but later copies may be subject to a small fee).
4. Right to request correction, supplementation, and updating of the personal data we process about you.
5. Right to request deletion of your personal data (“right to be forgotten”) You have the right to obtain from us the erasure of your personal data without undue delay in the following cases:
 - If the data are no longer necessary in relation to the purposes for which we have collected or otherwise processed them;
 - If you withdraw your consent to their processing and, at the same time, there will be no other legal ground for their processing (this applies only to the cases where we process your personal data based on your consent);
 - If you object to the processing conducted for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or processing for the legitimate interests pursued by the controller or by a third party, and there are no overriding legitimate grounds for the processing, or if you object to the processing for direct marketing purposes;
 - If your personal data is processed unlawfully;
 - If personal data must be erased in order to comply with the legal obligations of the controller;
 - If personal data were collected in connection with the use of information society services provided by the minor (under 15 years old). Please note that we will not be able to act on the request for the erasure of personal data if their processing is necessary for exercising the right of freedom of expression and information, for compliance with any of our legal obligations, for the performance of a task carried out in the public interest, for the establishment, exercise, or defense of our legal claims, or for other reasons provided for by law.
6. Right to restrict the processing of your personal data, if one of the following conditions is met:
 - The data subject contests the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data;
 - The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - The controller no longer needs the personal data for the processing, but the data subject requires it for the establishment, exercise, or defense of legal claims;
 - The data subject has objected to processing, pending the verification of whether the legitimate grounds of the controller override those of the data subject.

If the processing is restricted pursuant to the above, such personal data may only be further processed with the consent of the data subject, except for storage, or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal

person, or for reasons of important public interest. If the processing is restricted as stated above, the controller shall inform the data subject before the restriction of processing is lifted.

7. Right to data portability, which includes your right to receive the data you have provided to us in a structured, commonly used, and machine-readable format, and to transmit this data to another controller or to have the data directly transmitted by the data controller to another controller, where technically feasible, if following conditions are cumulatively met: 1) The processing is based on consent, or on a contract; 2) the processing is carried out by automated means.
8. Right to object – You have the right to object at any time to the processing of your personal data conducted for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or processing for the legitimate interests pursued by the controller or by a third party, or processing for direct marketing purposes. If you file such an objection, we will not be able to process your personal data unless we demonstrate compelling legal grounds for the processing which override your interests or rights and freedoms, or for the establishment, exercise, or defense of our legal claims.
9. Right not to be subjected to automated decision-making – You have the right not to be subject to a decision based solely on automated processing, including profiling, if that decision produces legal effects concerning you or similarly significantly affects your position. However, there are exceptions when above restriction does not apply, if the decision is: (i) necessary for entering into or performance of a contract between the data subject and the controller; (ii) based on law, provided that the law lays down suitable measures to safeguard the data subject's rights, freedoms, and legitimate interests; (iii) based on your explicit consent as the data subject. In the cases referred to in points (i) and (iii), the controller shall implement appropriate measures to safeguard the rights, freedoms, and legitimate interests of the data subject (an individual under our control shall participate in decision making, whereas the data subject will have the opportunity to express their views regarding the decision and can challenge the decision before an authorized representative of the controller).
10. Right to withdraw consent – In case the processing of your personal data is based on your consent, you will have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing based on the consent given before the withdrawal.
11. Right to lodge a complaint with the supervisory authority - You have the right to lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection (website: www.poverenik.rs) as the competent supervisory authority in accordance with the Law on Personal Data Protection of the Republic of Serbia.

Please note that some rights may be limited in accordance with relevant regulations, particularly to the extent that limiting your rights is necessary to protect the rights and freedoms of others, to ensure compliance with a legal obligation requiring data processing, filing, exercising or defending legal claims, or in cases where processing is carried out for purposes of scientific or historical research, and statistical purposes.

When exercising the rights listed in this section, we may request from you additional information necessary to confirm your identity.

ADDITIONAL GDPR DISCLOSURE – PROFILING

We may use automated tools to analyze simulated trading activity, performance metrics, and account behavior for the purpose of evaluating eligibility for programs or opportunities. Such processing does not

produce legal effects without human review. You have the right to request human intervention and to contest automated assessments.

If you are located in the European Union, you also have the right to lodge a complaint with your local EU supervisory authority in addition to the Serbian supervisory authority.