



PRIVACY POLICY

1. INTRODUCTION

LEVELS Ltd. ("LEVELS", the "Company", "we", "us", or "our") is committed to protecting the privacy, confidentiality, and security of personal data entrusted to us.

This Privacy Policy ("Policy") explains how the Company collects, uses, stores, processes, transfers, and protects personal data obtained through our Website, trading platforms, client onboarding procedures, business relationships, and related services.

By accessing our Website, opening an account, using our services, or otherwise providing personal information to the Company, you acknowledge that you have read and understood this Policy.

2. PURPOSE OF THIS POLICY

The purpose of this Policy is to:

- explain what personal data the Company collects;
- explain how personal data is used;
- explain how personal data may be shared;
- describe the Company's data protection practices;
- explain the rights available to individuals regarding their personal data;
- ensure transparency regarding the Company's data handling practices.

3. APPLICATION OF THIS POLICY

This Policy applies to:

- clients;
- prospective clients;
- beneficial owners;
- authorised representatives;
- website visitors;
- business contacts;
- introducers;
- service providers;
- other individuals whose personal data may be processed by the Company.

4. INFORMATION WE COLLECT

The Company may collect and process personal data including:

Identification Information

- full name;
- date of birth;
- nationality;
- gender;
- identification numbers; passport details;
- identity card details;
- tax identification numbers.

Contact Information

- residential address;
- mailing address;
- email address;
- telephone number.

Financial Information

- bank account details;
- payment information;
- transaction information;
- source of funds information;
- source of wealth information.

Corporate Information

Where applicable:

- company ownership information;
- beneficial ownership information;
- directorship information;
- authorised representative information.

Technical Information

- IP address;

- browser information;
- device information;
- operating system information;
- login information;
- platform usage information.

Communications

- emails;
- support requests;
- recorded calls;
- correspondence;
- account-related communications.

5. HOW WE COLLECT INFORMATION

Personal information may be collected:

- directly from the individual;
- through account applications;
- through onboarding processes;
- through the Website;
- through trading platforms;
- through communications with the Company;
- through service providers;
- through compliance databases;
- through public sources;
- through professional advisers;
- through third-party verification providers.

6. PURPOSES OF PROCESSING

The Company may process personal data for purposes including:

- account opening and administration;
- identity verification;
- customer due diligence;
- AML/CFT compliance;
- sanctions screening;
- fraud prevention;

- risk management;
- provision of services;
- transaction processing;
- customer support;
- regulatory compliance;
- legal proceedings;
- internal administration;
- business management;
- security monitoring;
- record keeping.

The Company shall process personal data only where it reasonably considers such processing necessary for legitimate business, legal, regulatory, contractual, or operational purposes.

7. LEGAL BASIS FOR PROCESSING

The Company may process personal data on one or more of the following grounds:

- performance of contractual obligations;
- compliance with legal obligations;
- protection of legitimate business interests;
- prevention of fraud and financial crime;
- protection of legal rights;
- consent where required;
- establishment, exercise, or defence of legal claims.

8. DISCLOSURE AND SHARING OF INFORMATION

The Company may disclose personal data where reasonably necessary for the operation of its business, the provision of services, compliance obligations, or the protection of its legitimate interests.

Personal data may be shared with:

- affiliated companies;
- liquidity providers;

- payment service providers;
- banking institutions;
- compliance service providers;
- auditors;
- legal advisers;
- consultants;
- technology providers;
- cloud service providers;
- identity verification providers;
- regulatory authorities;
- law enforcement agencies;
- courts and governmental bodies;
- other third parties where disclosure is required or permitted by law.

The Company shall take reasonable measures to ensure that recipients of personal data maintain appropriate standards of confidentiality and security.

9. INTERNATIONAL TRANSFERS

The Company may transfer, process, store, or access personal data in jurisdictions outside the country in which the individual resides.

Such transfers may occur where necessary for:

- the provision of services;
- compliance procedures;
- technology infrastructure;
- data hosting;
- operational requirements;
- legal or regulatory obligations.

Where appropriate, the Company shall implement reasonable safeguards to protect personal data during such transfers.

10. DATA SECURITY

The Company maintains administrative, technical, organisational, and physical safeguards designed to protect personal data against:

- unauthorised access;

- unauthorised disclosure;
- alteration;
- misuse;
- destruction;
- accidental loss.

Despite such measures, no system of transmission, storage, or processing can be guaranteed to be completely secure.

Accordingly, the Company cannot guarantee the absolute security of personal data.

11. DATA RETENTION

The Company shall retain personal data for as long as reasonably necessary to:

- provide services;
- comply with legal obligations;
- satisfy regulatory requirements;
- resolve disputes;
- defend legal claims;
- prevent fraud and financial crime;
- protect legitimate business interests.

Retention periods may vary depending on the nature of the information and applicable legal requirements.

Following the expiration of applicable retention periods, personal data may be securely deleted, anonymised, archived, or otherwise disposed of in accordance with the Company's procedures.

12. INDIVIDUAL RIGHTS

Subject to applicable laws and legal limitations, individuals may request:

- access to personal data held by the Company;
- correction of inaccurate information;
- updating of incomplete information;
- deletion of personal data where appropriate;
- restriction of certain processing activities;
- withdrawal of consent where consent forms the basis of processing;
- information regarding the processing of personal data.

The Company reserves the right to request proof of identity before responding to any such request.

Nothing in this Policy shall require the Company to take action that would conflict with legal, regulatory, compliance, record-retention, fraud prevention, or AML/CFT obligations.

13. COOKIES AND SIMILAR TECHNOLOGIES

The Company's Website may use cookies, analytics tools, tracking technologies, and similar technologies to:

- improve Website functionality;
- enhance user experience;
- analyse Website usage;
- improve security;
- support operational performance.

Cookies may collect information regarding:

- browser type;
- device information;
- IP address;
- Website usage patterns;
- session activity.

Users may control certain cookie settings through their browser preferences; however, disabling cookies may affect Website functionality.

14. MARKETING COMMUNICATIONS

The Company may communicate with clients and prospective clients regarding:

- products and services;
- account information;
- educational content;
- market updates;
- operational notices;
- promotional campaigns.

Individuals may request to opt out of marketing communications at any time.

The Company may continue to send communications that are necessary for contractual, legal, regulatory, security, compliance, or operational purposes.

15. RECORDED COMMUNICATIONS

The Company may monitor, record, retain, and review telephone calls, electronic communications, online chats, emails, video conferences, and other communications for purposes including:

- compliance;
- quality assurance;
- dispute resolution;
- fraud prevention;
- staff training;
- security;
- legal proceedings;

protection of the Company's legitimate business interests.

Such recordings may be retained in accordance with the Company's record retention procedures.

16. THIRD-PARTY WEBSITES

The Website may contain links to third-party websites or resources.

The Company is not responsible for:

- third-party privacy practices;
- third-party content;
- third-party security measures;
- third-party services.

Users should review the privacy policies of any third-party websites they visit.

17. AMENDMENTS

The Company reserves the right to amend, supplement, replace, or update this Policy from time to time.

Any amendment may become effective upon publication on the Website, Client Portal, Platform, or upon notification to affected individuals.

Continued use of the Company's services following such publication or notification shall constitute acceptance of the revised Policy.

18.RESERVATION OF RIGHTS

Nothing in this Policy shall limit any rights, powers, remedies, protections, or actions available to the Company under:

- the Client Agreement;
- the AML, CFT & KYC Policy;
- the Abuse & Market Manipulation Policy;
- the Best Interest & Order Execution Policy;
- the Risk Disclosure & Warning Notice;
- applicable laws;
- regulatory obligations.

The rights available to the Company are cumulative and may be exercised independently or together.

19.CONTACT INFORMATION

Questions, requests, complaints, or enquiries relating to this Privacy Policy or the processing of personal data may be submitted to the Company using the contact details published on the Website from time to time.

The Company may request sufficient information to verify the identity of any person making such a request before providing a response.

20.EFFECTIVE DATE

This Privacy Policy shall become effective on the date determined and published by the Company and shall remain in force until amended, replaced, or withdrawn by the Company.