



Mercia Securities Ltd

(formally Initial Merit Secure Ltd)

Privacy Policy

August 2026

CIF Licence No. 229/14 | Registration No. HE 291905

www.merciasecurities.com

info@merciasecurities.com 3 Pythagora Street, Pythagoras Court, 4th Floor, Limassol 3027, Cyprus +357 25 057221



Privacy Policy

August 2026

1. Introduction

In line with Article 24 of the General Data Protection Regulation (GDPR) (EU) 2016/679 (hereinafter, the “GDPR Law” and/or the “Law”), taking into account the nature, scope, context, and purposes of processing, as well as the risks to the rights and freedoms of individuals, Mercia Securities Ltd has implemented appropriate technical and organizational measures to ensure compliance with GDPR. This Privacy Policy outlines how Mercia Securities Ltd collects, processes, and protects personal data, and it is regularly reviewed and updated as needed.

This policy is designed to provide individuals with information on how Mercia Securities Ltd collects personal data, what it does with it, and with whom it may be shared. It complies with the requirements of the GDPR. Please read this privacy policy carefully, as it explains important details about who we are, how and why we collect, store, use, and share your personal information, and your rights concerning that data.

2. Who are we?

Mercia Securities Ltd, ("Mercia Securities Ltd", the "Company", "we", "us" or "our"), is a Cyprus Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission ("CySEC") with license number 229/14. The Company is incorporated in the Republic of Cyprus with Certificate of Incorporation No. HE 291905.

Our registered address is 3 Pythagora Street, Pythagoras Court, 4th Floor, 3027 Limassol, Cyprus. Our website is www.merciasecurities.com.

For the purposes of the GDPR, the Company acts as a controller for the personal data processed in connection with the services we provide, our website and our regulatory obligations. Where we engage service providers to process personal data on our behalf, those service providers act as processors and must process the data only in accordance with our instructions and applicable law.

3. Definitions

“You” or the “Data Subject” means the user who is using the Company's services and who may choose to provide his/her Personal Data to the Company and/or whose Personal Data may be subject to Processing (as hereinafter defined).

www.merciasecurities.com

info@merciasecurities.com 3 Pythagora Street, Pythagoras Court, 4th Floor, Limassol 3027, Cyprus +357 25 057221

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Visitor” means an individual other than a user, who uses the public area, but has no access to the restricted areas of the Site or Service.

4. Principles

This policy is based on the following data protection principles:

- a. The processing of personal data shall take place in a lawful, fair and transparent way;
- b. The collecting of personal data shall only be performed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. The collecting of personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed;
- d. The personal data shall be accurate and where necessary, kept up to date;
- e. Every reasonable step shall be taken to ensure that personal data that are inaccurate having regard to the purposes for which they are processed, are erased or rectified without delay;
- f. Personal data shall be kept in a form which permits identification of the data subject for no longer than is necessary for the purpose for which the personal data are processed;
- g. All personal data shall be kept confidential and stored in a manner that ensures appropriate security;
- h. Personal data shall not be shared with third parties except, when necessary, in order for them to provide services upon agreement;
- i. Data subjects shall have the right to request access to and rectification or erasure of personal data, or restriction of processing, or to object to processing as well as the right of data portability, as long as such requests do not conflict with the laws of the Republic of Cyprus.

5. Collection of information

5.1. In the process and following your registration as a client for a demo or live account with us and/or filling any other form on our Website, subscribing to our services, news or offers, marketing communications or posting material or contacting us via our communication methods, the following information about you ("Your Data") will be collected and stored for business, educational, service related, and/or legal purposes.

- a. **Personal Information:** Including but not limited to full name, address national identification number, passport number, email address and other details.
- b. **Financial Information:** including employment details, annual income, net worth and information required for regulatory and compliance purposes.

5.2. In addition, the Company may collect information through the observation of your interactions with our services and your trading behaviour, including:

- a. Website usage data, search activities, traffic data, and general location information.
- b. Communications with the Company, including correspondence via email, live chat, or telephone.
- c. Products you trade and their performance, data on trades and investment and historical data of payment and withdrawal activities.

5.3. The Company may collect the said information directly from you (during the account opening procedure) and/or from other persons including, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers.

5.4. Further to the above, the Company may also request further information to improve its Service to you (Existing or Potential Clients) or our activities (if you are our Provider for Trading Data) under our relevant Agreement, as the case may be, or comply with Applicable Regulations.

6. The type of data collected and purpose of collection

Personal data type	Purpose
Personal identification information, including name, date and place of birth, nationality, citizenship, identity card or passport details, tax identification number and proof of identity.	To verify your identity, comply with AML, KYC, client due diligence, sanctions screening and regulatory reporting obligations, and establish and maintain your account.
Contact information, including address, email address, telephone number and proof of address.	To communicate with you about your account, the services provided, service updates, regulatory notices, customer support and compliance matters.
Employment, education, financial situation, investment knowledge and trading experience.	To comply with KYC and regulatory obligations, assess suitability or appropriateness where applicable, understand your economic profile, and determine whether products or services are appropriate for you.
Bank account details, payment information, deposits, withdrawals and transaction history.	To process payments, administer your account, reconcile transactions, comply with record keeping obligations and prevent fraud, money laundering and other illegal activity.
Website, platform and device information, including IP address, device information, browser type, operating system, website usage data, cookie identifiers and traffic data.	To operate and secure our website and platforms, improve user experience, diagnose technical issues, prevent unauthorised access and perform analytics in an aggregated or non-identifying form where possible.
Communications, including telephone calls, emails, live chat, platform messages and other correspondence.	To provide support, respond to enquiries and complaints, monitor service quality, evidence instructions and comply with legal and regulatory record keeping obligations.
Compliance screening and risk information, including sanctions, PEP, fraud prevention and adverse media results where applicable.	To comply with AML, counter-terrorist financing, fraud prevention, sanctions and regulatory obligations and to protect the Company, clients and the integrity of the services.

7. How we use your personal Information:

7.1. The Company will process, use, store and handle your Personal Data in accordance with the General Data Protection Regulation 2016/679 and the Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such data of 2018, Law 125(I)/2018, as amended or replaced from time to time.



7.2. Your personal data (not publicly available information and/or already possessed by the Company without abiding with the provisions of the general data protection regulation), will be collected and processed explicitly and specifically only for the purposes that have been collected for ('purpose limitation') while the Company must require only the information necessary in relation to the purposes for which they have been collected.

7.3. We may transfer your personal information outside the European Economic Area. If we will make such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by Applicable Regulations. In furtherance, the Company follows the European Commission instructions in respect to this matter and it shall ensure that the third country that your data may be transferred is recognised by the EU Commission, as adequate in respect to the protection of your personal data.

7.4. We will process your Personal Data to enable us:

- a. to verify your identity in order to comply with the current Cypriot and European Anti-Money Laundering (AML) legislations, and with the obligations we have towards CySEC to perform the obligatory Know Your Customer (KYC) verifications and compliance procedures.
- b. to establish your trading account, issue you an account number and a secure password, maintain your account activity and contact you with account information, among other reasons. This information also helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.
- c. to provide our services to you and enable you to use them;
- d. to manage and administer the website and platform;
- e. to send you newsletters and other relevant and targeted promotional communications;
- f. to notify you of changes we have made or plan to make to the Website and / or platform;
- g. to send you emails as necessary;
- h. to request feedback from you on any transaction effected by you through our platform;



- i. to deal with enquiries, complaints and feedback from you and our service providers;
- j. to provide third parties with statistical anonymized information about our users;
- k. to analyze and improve the services offered on the Website.

If at any time you wish us to stop processing your Personal Data for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so. Please note that this may mean that your Account will be closed. You may contact us by sending an email to compliance@merciasecurities.com.

All your personal data is retained 5 years after the deactivation of your account. In some cases, when the regulator – the CySEC requires, we may retain your data for maximum 7 years after the deactivation of your account.

Should you close your account with us, Mercia Securities Ltd, will retain your information, but only use it to comply with regulatory requirements and legal obligations.

8. Disclosing your Personal Data

8.1 Except to the extent required by any applicable law or governmental or judicial body, we will only disclose such of your personal data to our third-party companies as is required for us or them to perform our or their services to you.

8.2 Except as described in 4.1, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without your prior explicit consent.

8.3 We will use all reasonable endeavours to ensure that any companies to whom we disclose your confidential information is compliant with the GDPR (or an equivalent standard) as regards its use and storage of your Personal Data.

8.4 In the event that we sell or buy any business or assets, we may disclose your personal data and transaction data to the prospective seller or buyer of such business or assets. If substantially all of the assets of the Company are acquired by a third party, personal data and transaction data held by it about its customers will be one of the transferred assets.

8.5 We will disclose your Personal Data if we are under a duty to disclose or share your personal data and transaction data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

8.6 If at any time you wish us to stop processing your Personal Data for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so, to the extent we are permitted by law. Please note that this may mean that your Account will be closed. You may contact us at: compliance@merciasecurities.com.

8.7 As part of using your personal information for the purpose set out above, we may disclose your information to:

- Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services.
- Partners or Tied Agents with whom the Company has closed relationships and who are exclusively working for the Company.
- Regulatory Authorities.
- Anyone authorised by you.
- Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
- Trade Repository or similar.
- The Company's employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.

The Company requires organizations outside the Company who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy policy.

9. Your Rights

9.1. We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. Your principal rights under the GDPR are as follows:

- the right for information;
- the right to access;
- the right to rectification;
- the right to erasure;
- the right to be forgotten;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to withdraw consent;



9.2. You shall have the right to exercise any of these rights, as long as such requests do not conflict with the laws of the Republic of Cyprus.

9.3. If you want to exercise any of those rights, you should contact our Data Protection Officer (DPO) via email at info@merciasecurities.com or via telephone at +357 25057221.

All formal requests for exercising your rights under the GDPR should be emailed to the DPO. We will acknowledge your request within seventy-two (72) hours and handle it promptly. We are going to process and reply to your request within a month, with a possibility to extend this period for particularly complex requests in accordance with Applicable Law. We will retain your Personal Data for as long as your account is active, as needed to provide you services, or to comply with our legal obligations, resolve disputes and enforce our agreements.

You may contact Mercia Securities Ltd for any reason under this Privacy Policy, or otherwise, as follows:

Mercia Securities Ltd
Address: 3 Pythagora Street, Pythagoras Court, 4th Floor, 3027 Limassol, Cyprus
Tel. No. +357 25057221
Fax. No. + 357 25754323
Email: info@merciasecurities.com

9.4. You may exercise your right to lodge a complaint with the Independent Supervisory Authority for the Protection of the Individual which is the Commissioner for Personal Data Protection through the contact information listed below:

Office of the Commissioner for Personal Data Protection
Office address: 15 Kypranoros Street, 1061 Nicosia, Cyprus
Postal address: P.O. Box 23378, 1682 Nicosia, Cyprus
Tel. No. +357 22818456
Fax. No. +357 22304565
Email: commissioner@dataprotection.gov.cy
Website: <https://www.dataprotection.gov.cy/>

The Company has no control over the content of third-party sites and accepts no responsibility or liability for them or for any loss or damage that may arise from your use of them. When accessing a third-party website, you are advised to check such website's terms of service and privacy policy to ensure compliance with applicable laws.

10. Legal Basis for processing personal data

Under the GDPR, we must have a lawful basis for each processing activity. Depending on the context, we rely on one or more of the following legal bases:

- a. **Contractual necessity:** Processing is necessary to perform a contract with you or to take steps at your request before entering into a contract, including opening and maintaining an account, providing services and communicating with you about those services.
- b. **Legal obligation:** Processing is necessary for compliance with legal and regulatory obligations to which the Company is subject, including AML, KYC, sanctions, tax, transaction reporting, record keeping, complaint handling and regulatory obligations.
- c. **Legitimate interests:** Processing is necessary for the legitimate interests pursued by the Company or a third party, provided that those interests are not overridden by your interests or fundamental rights and freedoms. Legitimate interests may include securing our systems, preventing fraud, improving services, managing business operations, communicating service-related information, and establishing, exercising or defending legal claims.
- d. **Consent:** Where required, we will ask for your freely given, specific, informed and unambiguous consent, for example for certain marketing activities, optional cookies or other processing where consent is the appropriate lawful basis. You may withdraw consent at any time.

11. Data Security

We take appropriate security measures to protect against loss, misuse and unauthorized access, alteration, disclosure, or destruction of your information. Company has taken steps to ensure the ongoing confidentiality, integrity, availability, and resilience of systems and services processing personal information, and will restore the availability and access to information in a timely manner in the event of a physical or technical incident.

Access to personal data is limited to employees, officers, contractors, processors and other persons who have a genuine business need to know. Those persons process personal data only in an authorised manner and are subject to duties of confidentiality.

We have procedures in place to respond to suspected personal data breaches. Where legally required, we will notify the competent supervisory authority and affected individuals in accordance with applicable law.

12. Data Retention Period

We retain personal data for as long as necessary to fulfil the purposes for which it was collected and to comply with our legal, regulatory, accounting, tax, reporting and record keeping obligations. As a regulated Cyprus Investment Firm, we generally retain personal data for at least five (5) years after the end of the business relationship or account closure. Where required by CySEC or applicable law, or where necessary for legal claims, complaints, investigations or regulatory inquiries, we may retain data for up to seven (7) years or for a longer period if required or permitted by law.

When personal data is no longer required, we will securely delete, anonymise or otherwise dispose of it in accordance with applicable law and our internal retention procedures.

13. Minors and children's privacy

Protecting the privacy of minors is especially important. Our Service is not directed to children under the age of 18, and we do not knowingly collect Personal Data from children under the age of 18. If you are under 18 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 18 years of age, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Service, then you may alert us at compliance@merciasecurities.com and request that we delete your child's Personal Data from our systems.

14. How to complain or resolve your queries

We hope that our Customer Support Team or Data Protection Officer can resolve any query or concern you raise about your personal data. You may contact us using the contact details below:

Mercia Securities Ltd
Address: 3 Pythagora Street, Pythagoras Court, 4th Floor, 3027 Limassol, Cyprus
Tel. No. +357 25057221
Fax. No. + 357 25754323
General email: info@merciasecurities.com
Compliance email: compliance@merciasecurities.com
Data Protection Officer: info@merciasecurities.com



If you are not satisfied with our response, you have the right to lodge a complaint with the Independent Supervisory Authority for the Protection of the Individual, which is the Commissioner for Personal Data Protection, using the contact details below:

Office of the Commissioner for Personal Data Protection
Office address: 15 Kypranoros Street, 1061 Nicosia, Cyprus
Postal address: P.O. Box 23378, 1682 Nicosia, Cyprus
Tel. No. +357 22818456
Fax. No. +357 22304565
Email: commissioner@dataprotection.gov.cy
Website: <https://www.dataprotection.gov.cy/>

15. Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. If we change this Privacy Policy in ways that affect how we use your Personal Data, we will advise you of the choices you may have as a result of those changes. We will also post a notice that this Privacy Policy has changed.

16. Do you need extra help?

If you would like to receive this Privacy Policy in another format or require assistance understanding it, please contact us using the contact details provided in the section "How to complain or resolve your queries" above.