



Privacy Statement

DATE

6 March 2026

PREPARED BY

DMA Europe B.V.

Principles – Our Commitment to Privacy

At DMA Europe B.V., we respect your privacy and take the protection of your personal information seriously. This Privacy Statement explains how we collect, use, and protect your data, and outlines the minimum standards applied across all DMA Europe operations. We process personal data in accordance with the General Data Protection Regulation (GDPR, AVG in the Netherlands) and applicable Dutch laws, ensuring your information is kept secure, confidential, and used only for legitimate purposes.

Contact Information

DMA Europe B.V. as the data controller, means that DMA determines the purpose and means of processing personal data, and is located at Oude Enghweg 2, 1217 JC Hilversum, Netherlands.

Phone: +31 35 303 5690

Email: info.eu@dma.co or info@noble-partners.nl

Who This Privacy Statement Applies To

This statement applies to all individuals whose personal data is processed by DMA Europe B.V. This means that if you a current client of ours or have shown an interest in one of our products and provided personal information by making an application – this includes:

- / Clients and their representatives
- / Potential clients and their representatives
- / Individuals affiliated with companies or organizations with which DMA Europe B.V. has or seeks a relationship
- / Website visitors
- / Newsletter and marketing email recipients
- / Anyone who contacts Today's Group or whose data is processed by us

Personal Data We Process

We process personal data you provide or that is necessary for our services. This includes:

- / Name, gender (male, female pr other), birth date/place, address, email, phone number, biometric data
- / Education, bank account(s), tax residency, ID copy and details
- / Recordings of calls and electronic communication.
- / Wealth origination
- / Data from public sources (e.g., Chamber of Commerce, LinkedIn)
- / IP address and cookies from website visits

Additional data for clients may include:

- / For natural persons (whether they are a private client or linked to a business client): National Identification Number (In the Netherlands, this is your BSN), investment profile, profession, income, assets, interests in listed companies (>1%), and tax residency.
- / For business clients: Chamber of Commerce data, revenue, entity assets, tax country, annual reports, statutes, shareholder registr(y)(ies), Ultimate Beneficial Owners (UBOs), and / or other possibly relevant documentation.



Special and Sensitive Personal Data

We may process your National Identification Number (such as a BSN or equivalent) when required by financial laws and regulations, including the Dutch Financial Supervision Act (Wft) and anti-money-laundering laws (Wwft).

Where the law does not require it, we will only process this information with your explicit consent.

Purpose of Data Processing

We use your data for:

- / Executing agreements (e.g., asset management, advice, execution-only services, art. 6.1 sub b AVG)
- / Maintaining relationships (art. 6.1 sub f AVG)
- / Managing accounts with either ourselves (DMA Europe Platform through a white label with Saxo Bank A/S) or third parties (e.g. EasyBroker with Interactive Brokers or Noble & Partners with DMA Europe B.V., Saxo Bank Netherlands, Interactive Brokers, ABN AMRO MeesPierson), using systems such as DMA SCRМ and Hubspot (art. 6.1 sub f AVG).
- / Providing support and communication
- / Handling orders and billing
- / Sending newsletters and marketing (only if and after you have given us explicit consent, art. 6.1 sub a AVG)
- / Informing about service/product changes
- / Improving services and products
- / Conducting surveys (with your consent)
- / Website behavior analysis
- / Comply with our legal and regulatory obligations, including MiFID II reporting and anti-money-laundering (Wwft) requirements (art. 6.1 sub c AVG)

Legal Basis for Processing

We process personal data based on the following legal grounds:

/ Contractual necessity

This is the primary legal basis that we intend to use for processing your data. The personal information that we collect about you is essential for us to be able to effectively carry out the services that we have agreed to deliver to you.

/ Legal obligations

To comply with laws and regulations that apply to financial institutions, such as the Wwft (anti-money-laundering law) and MiFID II requirements.

/ Legitimate interests

To pursue our own or third-party legitimate interests, such as improving our services, preventing fraud, and maintaining business operations, provided these interests are not overridden by your rights and freedoms.

Processors

We may use service providers (processors) for data processing, such as SaaS providers, hosting services, IT support, and email delivery. These processors operate under agreements that comply with GDPR (AVG). Processors include (the list is not complete) SCM DMA (pty) Ltd., Hubspot Ireland Ltd. several cloud service providers, SumSub Tech Ltd., scope Marketing Technology BV etc.

Data Retention and Sharing

During the course of our relationship with you, we will retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

Category	Maximum period	Legal basis
Financial administration and transaction data	7 years after end of relationship	Wft / Dutch fiscal law
Client-identification data (KYC/Wwft)	5 years after end of relationship	Wwft art. 33-34
Correspondence and communication history	5 years after end of relationship	Wft
Website visiting data (cookies)	Max. 13 months	Cooky law / AVG
CRM-data (potential cliënts)	2 years after last contact	Legitimate interest

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations as noted above.

Where we transfer personal data outside the European Economic Area (EEA), we ensure that appropriate safeguards are in place, such as standard contractual clauses approved by the European Commission.

We do not sell data. Data may be shared:

With regulators and custodians

- / If legally required by court order
- / For joint events (minimal contact data shared)
- / In case of company reorganization, merger, or sale

Examples are:

- / Custodians (for safekeeping of your securities);
- / HubSpot Ireland Limited – CRM and marketing platform (data processing and -sharing agreement has been signed; data are saved within the EU);
- / External accountants and auditors (legal requirement)
- / Regulators such as AFM and DNB (legal requirement)
- / Fiscal authorities (legal requirement)
- / IT-service providers and hosting partners (secured dataprocessing agreements)



Website Tracking

We use cookies for technical, functional, and analytical purposes. You can disable cookies via browser settings. Our website may link to third-party sites with their own privacy policies.

We do not intend to collect data from visitors under 18 without parental consent. If you believe we have done so, contact us to delete the data.

Automated Decision-Making

We do not make decisions with significant impact based solely on automated processing.

Your Rights

You have the right:

- / to request access to your records in order to have a copy thereof
- / to request correction of your personal data in the event that we hold incomplete or inaccurate personal information about you.
- / to request erasure of your data where it is no longer necessary for us to continue processing your personal data.
- / to the objection to processing of your personal data, which means that you may request that we stop the processing of your personal data
- / to the restriction to the processing of your personal data which means that you may request that we suspend the processing of your personal data.
- / to request data portability
- / to revoke your consent

In the event that you wish to exercise your rights in relation to your personal data, please send your requests to: support.eu@dma.co, or info@noble-partners.nl.

Please ensure to include a copy of your ID (with photo, MRZ (Machine Readable Zone), passport number, and BSN blacked out). We will respond within 4 weeks.

Complaints

If you wish to make a complaint, please refer to our Complaints Policy, which explains how to submit and escalate complaints and outlines our response timelines. If unresolved, you may contact the Dutch Data Protection Authority (autoriteitpersoonsgegevens.nl).

Data Security

We take appropriate measures to prevent misuse, loss, unauthorized access, and disclosure. These measures are in line with common standards within the financial world and comprise:

- / TLS/SSL-encryption of all data transmissions
- / Access security through two-factor authentication
- / Regular security audits and penetration-tests
- / Process agreements with our all suppliers
- / Internal security policy and employee training program

If you suspect a breach, contact us immediately.

Final

This statement may change due to developments or legal updates. Changes will be published on our website and client portal.

Note

Last updated: 6 March 2026.

