

Privacy Statement of DMA Europe

Applicable to the website, web-based solutions, application software, and related services provided by DMA Europe B.V.

Registered Name: DMA Europe B.V.

Registration Number: 32054576

1. General Information & Introduction

DMA Europe is an investment service provider registered with the Dutch Authority for the Financial Markets (Autoriteit Financiële Markten, hereinafter referred to as “AFM”) under the name DMA Europe B.V. It offers brokerage services under the name DMA ONE, wealth management under Today’s Wealth Management and Noble & Partners, as well as various execution-only services.

This Privacy Statement applies to the personal data of natural persons processed in the context of services provided by DMA Europe under any of the trade names mentioned in this Privacy Statement, including agreements with companies, associations, or foundations. Users are encouraged to notify DMA Europe of any changes to their information to ensure accuracy.

The latest version of this Privacy Statement is always available on our website. This document should be read in conjunction with the Cookie Statement and the relevant Terms and Conditions for individual services.

2. Responsibility for Personal Data

DMA Europe is responsible for your personal data. The Compliance Officer is appointed as the Data Protection Officer (DPO), tasked with overseeing data protection and responding to any user queries about data rights.

Contact Details:

DMA Europe

Oude Enghweg 2, 1217 JC Hilversum, The Netherlands

Phone: +31 (0)35 303 5690

Email: info@todaysgroup.nl, info@dmaeurope.nl, compliance@todaysgroup.nl,
info@dmaeurope.nl

Website: www.todaysgroup.nl

3. To Whom Does This Privacy Statement Apply?

This Privacy Statement applies to:

- Clients and their representatives.
- Potential clients and their representatives.
- Individuals affiliated with organizations DMA Europe has or is establishing relationships with.
- Website visitors.
- Recipients of newsletters and communications.

- All other individuals whose personal data DMA Europe processes.

4. What is Personal Data?

Personal data includes information such as name, date of birth, contact details, IP address, and customer details. It also includes sensitive information like financial records, tax residency, proof of identity, and other identifiers required for compliance and services.

5. How is Personal Data Obtained?

Personal data is obtained:

- Directly from users through interactions, applications, or service requests.
- Indirectly from public sources, such as the Chamber of Commerce, social media, or other third parties.

6. Purposes of Data Processing

DMA Europe processes personal data for the following purposes:

- **Account Management:** Facilitating account setup and maintenance.
- **Analysis:** Understanding user behavior for service improvement.
- **Communication:** Customer support, notifications, newsletters, and updates.
- **Contracts:** Executing and managing agreements.
- **Custodian Services:** Collaborating with custodians like Saxo Bank A/S, Saxo Bank Nederland, Interactive Brokers, and Caseis Bank for account-related processes. Please note that DMA Europe may also engage other custodians as necessary.
- **Regulatory Compliance:** Meeting obligations under AML, MiFID, and other legal frameworks.
- **Security and Risk Management:** Protecting systems, preventing fraud, and ensuring compliance with internal policies and standards.

7. Legal Basis for Data Processing

DMA Europe processes personal data based on:

1. **Permission:** Consent provided by the user.
2. **Agreement:** Fulfilling contractual obligations.
3. **Legal Obligations:** Compliance with Dutch and EU regulations.
4. **Legitimate Interests:** Operational needs, such as event invitations or service updates.

8. Data Processors

DMA Europe may engage processors for services like hosting, customer due diligence, or SaaS solutions. All processors are required to adhere to GDPR standards and ensure data security.

Some customer due diligence processes are outsourced to SCM DMA (Pty) Ltd in South Africa. While data is stored in European servers, limited processing may occur outside Europe under

strict security measures. Even in these cases, DMA Europe retains full control of the data, ensuring all processing adheres to GDPR requirements.

9. Data Retention

Data is retained for a maximum of seven years after service termination, except where required for investigations, legal claims, or regulatory compliance. Beyond retention periods, data is deleted or anonymized.

10. Cookies and Website Usage

DMA Europe's websites use cookies for functionality, analytics, and user convenience. Users can disable cookies through browser settings. The privacy policies of linked third-party websites should be reviewed separately.

DMA Europe does not knowingly collect data from children under 16 without parental consent. If you believe we have inadvertently collected such data, contact us immediately.

11. Automated Decision-Making

DMA Europe does not engage in automated decision-making processes that have significant effects on individuals.

12. Technical and Organizational Measures

DMA Europe employs robust security measures, including encryption, firewalls, access controls, and periodic audits, to protect personal data. Regular risk assessments ensure compliance with evolving security standards.

13. User Rights Under GDPR

Users have the right to:

- Access and view their data.
- Request corrections or updates.
- Request deletion (subject to legal and contractual constraints).
- Restrict processing of their data.
- Object to specific uses of their data.
- Transfer their data to another party.

Requests can be made by contacting **info@todaysgroup.nl**, **info@dmaeurope.nl** or **compliance@todaysgroup.nl**. Proof of identity may be required to ensure security and authenticity.

Hilversum, 5 November 2024

Contact Information:

Website: www.todaysgroup.nl | www.dmaeurope.nl | www.vladeracken.nl

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