FTMO GLOBAL PRIVACY NOTICE

DATED NOVEMBER 1, 2026

When taking part in our services through our website www.ftmo.com ("**Website**") (collectively "**Services**"), we collect, use, share and otherwise process personal data about you ("**you**").

The purpose of this Privacy Notice (the "**Notice**") is to provide you with more details about how we use your personal data. This Notice outlines, among others, information on who we are and how we process your personal data, the purposes for which personal data are collected and used, how long we use them, when they are shared with third parties, and what rights you have regarding your personal data.

1 WHO ARE WE AND WHOM TO CONTACT?

Our services are provided and therefore the controller of your personal data is an FTMO Group company **FTMO s.r.o.**, with its registered office at Purkyňova 2121/3, Nove Mesto, 110 00 Prague 1, Czech Republic, Business ID: 092 13 651 ("**FTMO**").

FTMO further in this Notice referred also as "we".

To exercise your rights or raise a complaint regarding the processing of your personal data, regardless of the stage you are at, please contact us at:

Email: support@ftmo.com

For other, more specific questions about how we process your personal data, you can also contact us at

Email: privacy@ftmo.com

Please note that prior to resolving your request, you may be asked to verify your identity.

2 WHAT INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE OBTAIN IT?

In order for you to be able to use our Services, we need to obtain and process personal data about you. Detailed information on the purposes for which we process personal data is given in Section 3 of this Notice.

2.1 Depending on the Services you access, we may process the following information about you:

a. Identification and contact data: name and surname, telephone number, email address, postal address, date of birth or tax identification number (e.g. Social Security Number).

b. Login credentials: login credentials such as username and password to the Client Area as well as for accessing demo accounts on a trading platform.

c. Documents and information gathered during the Know Your Customer (KYC) and Know Your Business (KYB) procedures, such as date of birth, copies of identity documents, a face scan (biometric data), and results of automated checks including sanctions screening and liveness checks.

d. Payment data, including payment method details (e.g. bank account, crypto wallet information), payment transactions overview including dates and amounts related to our Services and payouts on Sim-Funded or FTMO Accounts.

e. Records of any communication between you and us, including inquiries, support tickets, complaints, dispute resolution records, and recordings of phone calls with our customer support.

f. Your device data, such as IP address, device type, operating system, or browser used.

g. Website usage data, including date, time and duration of visit, country of access, browsing history, and overview of the various functionalities accessed.

h. Any other data related to the operation and maintenance of the Website, Client Area, and internal system.

i. Information related to your use of Services, such as an overview of all purchases, your access and use of the Services including your performance during the FTMO Challenge or Evaluation, your participation in the FTMO Account and Sim-Funded Account, which includes information on your simulated trading, which includes simulated trades, orders, positions, balances, and performance metrics, as well as records of your adherence to our requirements. If you gain access to the Live Funded Account, we will process information related to your access and use of it as well.

j. Data from social network operators if you link your social networking accounts to your Client Area profile on the website (username, profile picture, email address associated with the account).

k. Other information you may disclose or may be required to be disclosed to us during the duration of your relationship with us.

2.2 The above information may be collected from various sources. Most often, it will be provided directly by you or generated by your use of the Services. However, we may also collect information related to you from third parties, such as during KYC/KYB processes where we perform various checks, or from payment service providers.

2.3 To use our Services, you must provide your identification and contact data, login credentials, payment data and the information required for KYC/KYB. We need this data to perform our contract with you and to meet our legal obligations. If you do not provide it, we will not be able to provide you with the Services. Providing any other information is voluntary.

3 HOW WE USE YOUR PERSONAL DATA

3.1 We use personal data for the following purposes:

a. **Registration and user profile management**

i. In order to access and use most of our Services, you need to register on the Website and create a profile.

ii. **Legal basis:** Performance of our contract with you.

b. **Provision of Services**

i. We will process your personal data to enable you to access and use our Services, and to provide you with access to various tools, applications, and support, and to carry out simulated trades.

ii. We monitor your performance and adherence to our contractual obligations, including the Trading Objectives, Risk Management Rules, and Forbidden Trading Practices.

iii. **Legal basis:** Performance of our contract with you. Monitoring your adherence to our rules is also based on our legitimate interest in ensuring the integrity of the Services.

c. **Payment Administration**

i. To administer payments for our Services as well as process refunds (if applicable). We also need to calculate and process Rewards, issue invoices, and comply with tax reporting obligations.

ii. **Legal basis:** Performance of our contract with you and compliance with our legal obligations (e.g. tax and accounting).

d. **Identity verification**

i. Whenever you are accessing the Services, we need to verify your identity and eligibility for the Services. To do this, you will be asked to undergo our KYC/KYB procedures, which vary

based on the Service accessed. This verification is essential for us to properly provide Services and comply with applicable laws.

ii. **Legal basis:** Compliance with our legal obligations and our legitimate interest in verifying your eligibility and preventing fraud. We process your biometric data (face scan) only based on your consent.

e. **Customer support and relationship management**

i. We process your personal data when addressing your inquiries, resolving any of your requests and concerns. Over the course of our relationship, we will also provide you with notifications and updates on the Services to keep you informed of any news or important changes.

ii. We aim for your satisfaction when using the Services. To that end, we internally maintain your profile to ensure a seamless experience across all Services.

iii. Phone calls with our customer support are recorded, and our supervisors may listen to them, to monitor and improve the quality of our support.

iv. **Legal basis:** Performance of our contract with you and our legitimate interest in maintaining a good relationship with our customers.

f. **Marketing**

i. We will send you marketing communications about our Services, products, and promotions, based on your preferences. We might also show our campaigns to you on other unrelated websites and social networks of our marketing partners. To do this, we use tools such as advertising cookies and pixels (subject to your cookie settings) and may share your details with advertising platforms such as Google or Meta so they can show you relevant ads. For more details, see our Cookie Policy.

ii. **Legal basis:** Our legitimate interest in promoting our Services to existing customers or, where required by law, your consent.

g. **Services improvement and analytics**

i. We analyze customer behavior to improve our Services, develop and test new features. This includes analysis of how our Services are specifically used and what the trends are in order to provide Services which are sustainable and for us to be able to always provide top-quality experience.

ii. We may also invite you to take part in surveys or interviews about our Services. Taking part is voluntary, and we use the results mainly in aggregated form.

iii. Analysis of your simulated trading: We specifically focus on analyzing your simulated trading behavior not only to improve our Services but to also help us make decision on which simulated trades to copy when we perform our own trading in financial products.

iv. **Legal basis:** Our legitimate interest in improving our Services and in making informed decisions about our own trading.

h. **Internal operations and improvements**

i. In some cases, it is not possible to implement new software, applications, and processes or their changes without testing them using your personal data, however, we always do so only to the extent necessary.

ii. Conducting internal audit and record keeping.

iii. **Legal basis:** Our legitimate interest in running and developing our business efficiently and securely.

i. **Protection of our legitimate interests**

i. To defend against any legal claims or to protect our interests.

ii. We use personal data to manage our internal risks, which include fraud prevention and detection of any abusive practices (including the use of Forbidden Trading Practices) across the Services and their enforcement through available legal means.

iii. **Legal basis:** Our legitimate interest in protecting our rights and preventing fraud and abuse.

j. **Services Security**

i. Ensuring the security of our Services is our priority, and we use various measures (organizational as well as technical) to reach this goal. Some of these measures require processing of your personal data.

ii. **Legal basis:** Our legitimate interest in keeping our Services secure and, where applicable, compliance with our legal obligations.

k. **Fulfilment of legal obligations**

i. To maintain accounting and tax records, communicate with relevant regulators, and respond to lawful queries from public authorities or perform necessary reporting (e.g., tax reporting).

ii. **Legal basis:** Compliance with our legal obligations.

4 HOW DO WE STORE PERSONAL DATA AND HOW IS IT SECURED?

We process your personal data in a secure environment. Appropriate organizational and technical measures are in place to protect against unauthorized access, alteration, disclosure, or destruction. We strictly adhere to these measures to ensure the security of your data, and while we will do our best to protect your personal data, we cannot completely guarantee the security of your data transmitted to us. Please note that any transmission is at your own risk.

5 DATA SHARING AND TRANSFERS TO THIRD COUNTRIES

5.1 Data Sharing

a. Over the course of our activities, we may share your personal data with other individuals or entities for various reasons, primarily to ensure seamless provision of our Services, the fulfillment of our legal obligations, and to protect our legitimate interests.

We may share your personal data with the following categories of recipients:

i. Trading platform providers, to enable simulated trading when using the Services.

ii. IT infrastructure providers, including cloud service providers, IT contractors, software providers, and cybersecurity services.

iii. Payment service providers and financial institutions, for payment processing and related transactions.

iv. Providers helping us with KYC/KYB processes and tax declarations.

v. Customer support, marketing, and communication service providers.

vi. Our affiliate partners, if you came to us through their referral link, to the limited extent needed to calculate their commission (e.g. your first name, the first letter of your last name, and your orders).

vii. Advisors and consultants, including external accountants, auditors, and legal advisors.

viii. Governmental authorities, in response to lawful requests or in order to fulfil our reporting obligations (such as to tax authorities).

ix. Courts, arbitrators, and other dispute resolution bodies, as well as other parties to a dispute and their legal representatives, where necessary to establish, exercise, or defend our legal claims.

x. Sharing with our FTMO Group affiliates in order to facilitate the Services, provide you with comprehensive support, analyze and improve the Services, and to manage associated risks on a consolidated basis.

xi. In the event of business transfers (such as mergers, acquisitions, reorganization or sale of assets), your personal data may be disclosed or transferred as part of such transaction.

xii. If you are offered a Live Funded Account, we will share necessary information with the broker with whom the Live Funded Account is held.

b. When we share personal data with our suppliers or other persons to process personal data on our behalf, we remain responsible and liable for such processing. Such sharing is governed by agreements restricting the use of personal data to the limited purposes for which it is provided.

c. Note that certain third parties may collect personal data for their own purposes, in which case their own privacy notices apply.

5.2 **International Data Transfers**

Your personal data may be accessed from or transferred to jurisdictions outside of the original jurisdiction of collection where some of our FTMO Group affiliates are based, as well as countries where our service providers operate. Such transfers occur only where appropriate safeguards in accordance with applicable law are in place, such as Standard Contractual Clauses or the Data Privacy Framework. We ensure all such transfers comply with applicable data protection laws.

6 HOW LONG DO WE PROCESS YOUR DATA?

6.1 We retain personal data only for as long as necessary to achieve the purposes described above or for a period directly set out by law. After such a period, your personal data will be deleted or anonymized. To determine the appropriate retention period for personal data, we consider the following criteria and timelines:

a. For contract performance - the period required to manage any related rights and obligations.

b. We will use your personal data for marketing communications as long as you have a relationship with us or have otherwise agreed. We will, however, maintain a record of your email address on a suppression list to ensure we honor your opt-out request in the future.

c. The requirements of applicable laws and regulations, such as those for tax and accounting records (e.g., 10 years for tax records).

d. Data collected for Know Your Customer (KYC) purposes is retained for the duration of the relationship and for a legally mandated period after its termination.

e. For consent-based processing, the period specified in the consent.

f. Our need to address disputes, protect our legal interests, or enforce our agreements.

7 YOUR PRIVACY RIGHTS

7.1 You can exercise your rights by sending a request to us via email at support@ftmo.com or using the contact details in Section 1 of this Notice. Please be specific in your request to help us assist you efficiently. We respond to inquiries within 30 days. While we are committed to honoring your requests, these rights are not absolute and may be subject to legal limitations. Your rights include:

a. **Right of access:** Request confirmation as to whether your personal data are being processed and obtain further details such as the categories of sources from which the personal data is collected, the business or commercial purpose for collecting, selling, or sharing personal data, the categories of third parties to whom we disclose personal data, and the specific pieces of personal data we have collected about you.

b. **Right to rectification:** If we process your personal data inaccurately, you can notify us, and we will rectify the inaccurate personal data without undue delay. You will be able to edit some of your personal data yourself via your profile on the Website.

c. **Right to delete:** Request deletion of your personal data in certain circumstances, such as when personal data are no longer necessary, you withdraw consent under which we process the relevant personal data, or processing is unlawful.

d. **Right to restriction of processing:** Request restriction of processing in specific situations, such as contesting accuracy or pending an objection.

e. **Right to data portability:** Receive your personal data in a structured, commonly used, machine-readable format and have them transmitted where applicable.

f. **Right to object:** Object to processing based on legitimate interests or for direct marketing purposes.

g. **Right to withdraw consent:** Withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

h. **Right not to be subject to automated decision-making:** Not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects or similarly significantly affect you, except as permitted by law.

   Your results in the FTMO Challenge, FTMO Instant Account and Evaluation are assessed automatically, based on the objective Trading Objectives set out in our terms, as this is necessary for performing our contract with you. If you disagree with the result, you can contact our support and ask for it to be reviewed by a member of our team.

i. **Right to lodge a complaint:** Lodge a complaint with the relevant supervisory authority if you believe your data are being processed unlawfully. Based on our registered office, our lead supervisory authority is the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, posta@uoou.cz, https://www.uoou.cz/en/.

j. **Right to limit use and disclosure of sensitive personal information**: If we process sensitive personal information about you, you may limit its use to the purposes necessary for delivering requested Services or as otherwise permitted by law (e.g., security, legal compliance).

k. **Right to non-discrimination**: We will not discriminate against you for exercising any of your rights relating to your personal data. This means we will not deny you our Services, charge you different prices, or provide a different level or quality of Services if you exercise your rights.

7.2 Please be aware that certain exceptions apply to the exercise of these rights, and so you will not be able to exercise them in all situations.

8 CHANGES TO THIS NOTICE

We may update this Notice from time to time to reflect changes in our practices or to align it with applicable legal requirements. We encourage you to review this Notice periodically to stay informed about how we are protecting your information.