

VarietyX

PRIVACY NOTICE

Last Modified: January 12, 2026

OM2 Technologies Ltd. owner of the product VarietyX ("VarietyX" or "Company") is publishing this Privacy Notice (the "Notice") in connection with the collection and processing of personal data through our website variety.io and any of its subdomains (the "Website"). The Website provides informative materials, business contact information and landing pages to VarietyX's product and services, including our proprietary software option trading platform for brokers (the "Platform" and collectively, the "Services").

This Notice was designed to help you better understand the information we collect, store, use and share when you use, interact with or otherwise access our Website. Please note that this Notice does not describe the processing and collection of personal data through our Services, which are detailed in separate licensing and services agreements executed between the Company and customers. This Notice also does not apply to any third-party websites, services or applications, even if they are accessible through our Website.

We strongly urge you to read this Notice and make sure that you fully understand and agree to it. If you do not agree to this Notice, please discontinue and avoid using our Website.

TYPES OF DATA COLLECTED AND PURPOSES:

Depending on your interaction with us, we may collect two types of data from you:

"Non-Personal Data" means aggregated, non-personal non-identifiable information, which may be made available or gathered via your access to and use of the Website. We are not aware of the identity of the user from which the Non-Personal Data is collected. Such Non-Personal Data may include aggregated usage information and technical information transmitted by your device, such as browser version, operating system type and version, mobile network information, device settings, and software data.

"Personal Data" (as defined under the GDPR) or **"Personal Information"** (as defined under the CCPA or other US privacy legislations) means individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual.

For the avoidance of doubt, any Non-Personal Data connected or linked to any Personal Data shall be deemed as Personal Data as long as such connection or linkage exists.

The table below details the types of Personal Data we collect, the methods and purpose of such collection, and our lawful basis for processing such Personal Data (where the GDPR applies):

DATA TYPE	METHODS AND PURPOSE	LAWFUL BASIS
Contact Information	If you voluntarily contact us, or enquire about our Website or Services or any other matters, through any means of communications we make available through our Website, you may be required	We process Contact Information subject to your consent. Further processing may be subject to our legitimate interest, for example for

	<p>to provide us with certain contact information such as your name, workplace, position, physical address, email address, phone number, or any additional information you decide to share with us (“Contact Information <p>The correspondence and its contents with you may be processed and stored by us in order to improve our customer service and in the event we believe it is required to continue to store it, for example, in the event of any claims or in order to provide you with any further assistance (if applicable).</p> </p>	internal documentation and improvement of service purposes.
Registration and Onboarding Information	As part of the onboarding process of our Services, which may be accessible through our Website, you may be asked to provide us certain details regarding your company's controlling officer and principals, and we may receive additional information about them from third parties. The information may include the following: name, home address, zip code, Social Security Number or another personal identifier (e.g. passport number), date of birth, phone number and position title (“ Registration Information ”).	We are required to collect and process this Personal Information for the proper operation and offering of Services, billing, and customer support and product customization. Further processing may be required for regulatory and contractual obligations (e.g., AML/CTF and export regulations).
Website Interaction, Device Information and Marketing	When you interact with our Website, we may collect your online identifiers, such as Internet Protocol (IP) address, device identifiers, Cookie ID and tracking technologies and other unique identifiers (“ Online Identifiers ”). Online Identifiers are used in particular to operate the Website and enable its proper functionality, for example, to automatically recognize you by the next time you enter the Website or to confirm you are a real person.	<p>Strictly necessary cookies are required for the proper and basic operation of the Website and Services and will be processed in our legitimate interests, where such cookies collect Personal Data on our behalf.</p> <p>Other cookies, to the extent these collect your Personal Data, will be based on your consent which we will obtain through our cookie notice and consent mechanism.</p>
User Content	When you use our Website, we may collect Personal Information that is included in the input, texts, prompts, questions, comments, interactions, links, file uploads, or feedback that you provide to our	User Content is required for the proper and basic operation of the Website and offering of Services. Further processing may be subject to our legitimate interest, for

	Services ("Content"). You are not required (and we recommend you not) to include any Personal Data in your Content.	example for internal documentation and improvement of our Website and Services.
General	We may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of the Website and Services, to enforce our legal terms and conditions, to protect the security or integrity of our databases, and to take precautions against legal liability.	Such processing is based on our legitimate interests, which in this case are protecting our Website and Services and data, exercising our legal rights, and complying with our legal obligations.

Please note that the actual processing operation per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure or destruction. The transfer of Personal Data to third party countries as further detailed in the Data Transfer Section is based on the same lawful basis as stipulated in the table above.

HOW WE MAY COLLECT YOUR INFORMATION:

- **Automatically**, when you interact with or access our Website, including through the use of cookies and similar tracking technologies.
- When you **voluntarily** choose to provide us with information, such as when you contact us or share Personal Data through our Website, all as detailed in this Notice. This includes your Contact Information, Registration Information and Content.

DATA SHARING – CATEGORIES OF RECIPIENTS WE MAY SHARE PERSONAL DATA WITH

We may share your Personal Data with third parties, including our service providers that help us maintain our Website and Services. More information about the categories of such third-party recipients is described below:

CATEGORY OF RECIPIENT	DATA THAT WILL BE SHARED	PURPOSE OF SHARING
Service Providers	All types of Personal Data collected by us	We may disclose Personal Data to our service providers, contractors and third parties, including, but not limited to, our cloud and hosting provider, analytics and marketing providers, payment processors (for paying customers), CRM systems etc.
Affiliated Companies	All types of Personal Data collected by us	We may share Personal Data with our affiliated companies in accordance with the terms of this Notice. We share such Personal Data for the purpose of providing the Services, improving our Website and Services, aggregate statistics, marketing and conduct

		business and marketing analysis, customer support, and to enhance your experience.
Consent Manager ("CMP")	Online Identifiers and the user's preference.	When you browse our Website for the first time, depending on your location, a CMP may appear, where you will be able to choose if you allow us and our partners to implement tracking technologies, and where applicable, to share Personal Data (e.g., Online Identifiers) with third parties for one or all of the aforesaid purposes ("Preference"). These Preference are different depending on your jurisdiction. The CMP receives the Online Identifiers from us.
Any acquirer of our business	All types of Personal Data	We may share Personal Data, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Notice.
Legal and law enforcement	Subject to law enforcement authority request.	We may disclose certain data to law enforcement and governmental agencies, or authorized third parties, in response to a verified request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other user to legal liability, and solely to the extent necessary to comply with such purpose.

We do not sell or share Personal Information as defined by US privacy laws and have not done so in the past 12 months.

We reserve the right to use, disclose or transfer (for business purposes or otherwise) aggregated and processed Non-Personal Data to third parties, including, *inter alia*, affiliates, for various purposes including commercial use. This information may be collected, processed and analyzed by us and transferred in a combined, collectively and aggregated manner (i.e., your information is immediately aggregated with other users) to third parties.

When we share information with service providers, we ensure they only have access to such information that is strictly necessary for us to provide the Website and Services. These parties are required to secure the Personal Data they receive and to use the Personal Data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other Non-Personal Data for their own benefit).

DATA RETENTION

We retain the data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable laws, or until you express your preference to opt-out, where applicable.

The retention periods are determined according to the following criteria:

- where we have a valid a business reason to process your Personal Data, such as the provision of our service.
- where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements;
- for us to have an accurate record of your dealings with us in the event of any complaints or challenges;
- if we reasonably believe there is a prospect of litigation relating to your Personal Data.

Please note that except as required by applicable law, we will not be obligated to retain your data for any particular period, and we may delete it for any reason and at any time, without providing you with prior notice. However, retention periods will be determined by taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time and in a way that prevents the Data from being restored or reconstructed.

USER RIGHTS AND REQUESTS

In order to exercise any of your rights (e.g., right to erasure) under applicable data protection laws, please contact us through the email address below. Please include your full name, and email address so we are able to handle your request properly. Subject to applicable laws, we may require that you provide additional information to verify your identity before allowing you to exercise certain rights.

SECURITY MEASURES

We use reasonable organizational, technical, and administrative measures to protect your Personal Data. However, while we work hard to protect the Personal Data we process from unauthorized access or disclosure, we cannot be held responsible for unauthorized or unintended access beyond our control, and we make no warranty that we will always be able to prevent such access.

Please contact us via the methods available below if you feel that your privacy was not managed properly, or if you become aware of an attempt by a third party to gain unauthorized access to your Personal Data. We will make a reasonable effort to notify you and the relevant authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

ELIGIBILITY AND CHILDREN PRIVACY

The Website is not intended for use by individuals under the age of majority, as defined by the applicable law in such individual's jurisdiction of residence ("**Minor**"). We do not knowingly process Minor's information and will discard any data we receive from a user that we find or reasonably suspect to be a Minor immediately upon discovery. Please contact us via the details available below if you have reason to believe that a Minor has shared any data with us.

NOTICE AMENDMENTS:

The updated date of this Notice will be reflected in the "Last Modified" heading, indicated at the header of the Notice. Where required by applicable law, we will obtain your consent. We recommend you review this Notice periodically to ensure that you understand our most updated privacy practices

CONTACT INFORMATION:

If you have any question, inquiry or concern related to this Notice or the processing of your Personal Data, you may contact us at: info@varietyx.io.