



wematch.live

# **Wematch.live Services Privacy Policy**

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## 1. Introduction

Dear user! Wematch.live R&D Limited together with its affiliates and subsidiaries ('**We**' or '**Us**' or '**Wematch**') values your privacy and wishes to let you know how it handles your personal information.

This privacy policy explains which personal information is collected about you via our Services, provided to our Business Customers ('**Business Customers**'), as a B2B web platform (the '**Platform**'), and how we process it. This policy also contains information on online identifiers we use ('**cookies**').

Wematch operates as a Processor or Service Provider ('**Service Provider**') on behalf of its Business Customers, such as banks and other financial institutions, and therefore operates solely based on their instructions.

For the avoidance of doubt, Wematch is not selling your personal information and has not done so in the past 12 months.

## 2. What does Wematch do?

The Platform is a matching and workflow management platform, provided as a web-based service to Business Customers ("The Services").

## 3. Children

**The Services are not directed to individuals under 18.** Wematch does not knowingly collect personal information from individuals under the age of 18, as it has no control over its Business Customers' user permissions. If you are a parent of an individual under 18 and believe your child has provided personal information to Wematch, please contact us at [privacy@wematch.live](mailto:privacy@wematch.live).

## 4. What kind of information do we collect?

If you use our Services via the Platform, as a user acting on behalf of our Business Customers, you may provide us with the following information:

- a. Contact information: Full name, Company phone number, Trading Desk location, Company e-mail address, Position. If you are a user using our US broker-dealer services we may also collect your CRD number, date of birth and home address for KYC purposes.
- b. Information regarding your use of the Platform: Usage frequency and manner, login attempts, user inputs to the Platform, trades history and summary.
- c. Passive-technical information such as User ID (which is assigned by the Platform), IP address of your end-point device.
- d. User Communication: communication with Us, as documented over external messaging platforms such as Bloomberg messaging or Symphony, including relevant parties to the communication and time-stamp.

- e. Online identifiers (e.g. cookies, tags, etc.): used for operational reasons such as authentication, session persistence, data cache, etc. For more information about the online identifiers, please go to our Cookies Policy in Section 12 of this document.

We do not collect any performance information or any behavioral information about you. The information collected regarding the trades conducted or attempted is merely a list and summary of the trades and their inherent information (e.g. the price and with whom you performed it).

## 5. How and why do we collect information?

We primarily use the information collected to provide our Services and to operate the Platform, to collect fees from our Business Customers, to further provide the Services, and to provide needed assistance and improvements.

We are committed to maintaining technical oversight and continuously improving our Platform and services. Accordingly, the information collected may be used for analytical and statistical purposes, to enhance the functionality, efficiency, and quality of our Services and the Platform, as well as to support the development of future services and products. This use is based on fulfilling our contractual obligations or advancing our legitimate interests.

We shall provide you with marketing and direct marketing materials as a business user according to our legitimate interest.

You are not obliged to provide any of the information above, but without it we will not be able to fully operate the Services provided or grant you the use of the Platform.

Please note that we do not manage your consent for using the Services or the Platform. If you wish to opt out of any service we provide or exercise any of your rights (as outlined below), you should contact the Business Customer on whose behalf you are using or intend to use the Platform or Services.

## 6. Retention

We may retain your information for the period consistent with the original purpose of collection. For instance, we may keep any registration details and or any access information you have provided us, as long as you make use of the Platform or any of our services.

We may also retain your information as needed to pursue our purposes as described above, for the duration of our engagement with our Business Customers, for complying with legal and regulatory duties, to resolve future or ongoing disputes, to enforce our agreements and for various tax purposes and requirements. For example, we may retain your information longer than your actual use of the Platform, for archiving and backup purposes, as instructed by our Business customers or by law.

We may keep aggregated non-identifiable information without limitation, and to the extent reasonable we will delete or de-identify potentially identifiable information when we no longer need to process the information.

## 7. Sharing of information collected

We may share information, as follows:

### a. With our business Customers

As users of our Business Customers, we will share with them all collected information as outlined above. However, we do not collect any performance or behavioral data about you. The trade information we provide is a summarized record, including details such as prices, rates, and counterparties.

### b. For legal and/or regulatory reasons

We may share your information if we reasonably believe that:

1. It is necessary to comply with a legal and/or regulatory process or inquiry (such as a court order, subpoena, or search warrant) or any other legal and/or regulatory requirements of any governmental authority;
2. For archiving purposes based on legal requirements;
3. It would potentially mitigate our liability in an actual or potential lawsuit;
4. It is necessary to enforce this privacy policy or any other agreement in place between us, or between us and our Business Customer;
5. It is necessary to investigate and prevent unauthorized transactions or other illegal activities, and/or;
6. It is otherwise necessary or appropriate to protect our rights or property or the rights or property of any person or entity.

### c. Service providers

We use a limited number of third-party service providers, who act as our own service providers, and assist us in making our Services available. For example, we may share information with third parties who provide services to us, such as: Google, Hubspot, Amazon Web Services, MongoDB, Redash, Notion, Mezmo (ex LogDNA), Slack (Salesforce), and Global Relay.

These third parties may access, process, or store the information while providing their services to us, and they may vary from time to time.

### d. Other Business Customers and their users

While we do not actively transfer the following information ourselves, please be aware that when you use our Platform, the parties involved in the interaction may have access to each other's company email and name, as these details are directly disclosed through your use of the Platform.

### e. Affiliates and Partners

Wematch acts globally and has several 'legal entities' across the globe, which all take part in the group effort to provide the services. Hence, in the course of providing our services, each of our legal entities, subsidiaries, parent companies, etc., may access or process your information, for the said purposes.

We may also share information that will not directly identify you, with our affiliates, subsidiaries, parent companies, partners, or other affiliates of the Wematch company to

deliver and improve the Services and the Platform, or to produce future services and products.

#### f. Structural Changes

In any case of acquisition, merger or any other structural change, we may share the information collected, provided that the said entity shall undertake the provisions of this Privacy Policy.

#### g. Market Infrastructure Providers

we may share your information with market infrastructure providers, such as clearing houses and settlement systems, in the course of delivering the Services to you.

## 8. Your rights

The following rights are granted to you by law. As we operate as Service providers on behalf of our Business Customers, to redeem any of those please contact them directly.

#### a. Your rights under California law or another specific US state law

**You have the right, under law, to request the execution of the following rights, from the applicable Business Customer:** 'Right to Know' – As a Californian resident, California law provides you the right to know what personal information about you has been collected, used, and disclosed. If any of the information is wrong or incomplete, you may ask to rectify it.

'Right to Deletion' – As a Californian resident, California law provides you the right to request the deletion of any personal information that has been collected about you.

Please note that The Business Customer may not discriminate against you for exercising any rights under the California Consumer Privacy Act.

**Consumer Rights Notice.** Under California Civil Code Section 1789.3, Wematch is required to provide California residents with the following specific consumer rights information:

- This Platform is owned and operated by Wematch.live R&D LTD Ltd.
- To file a complaint regarding this Platform or to receive further information regarding use of this Platform, please contact us via email at [Privacy@wematch.live](mailto:Privacy@wematch.live). We will do our best to reply within a reasonable time.
- You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

#### b. Your EU/ UK Data Subject Rights

As an EU/ UK individual, If you would like to request to review, correct, update, delete Personal Information, restrict the processing of your Personal Information, object to the processing of your Personal Information, or if you would like to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent

this right to data portability is provided to you by applicable law), please connect with the relevant Business Customer in order to request to exercise your rights.

A summary and further details about your rights under EU data protection laws are available on the EU Commission's website at:

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en).

c. **General & Other**

- 1) Wematch is in no case responsible for the personal information held independently by our Business Customers, or for the accuracy of such information made available to Us.
- 2) Wematch shall act solely upon the instructions of its Business Customers, therefore it is in no case responsible for the acceptance of your data subject requests as described above.
- 3) While any action regarding your personal information should be directed to our Business Customers, we reserve the right to verify your identity before processing any related request.

If you are not a California resident or an EU/UK individual but believe you are entitled to the rights mentioned above under another legal framework, you may contact us or the relevant Business Customer on whose behalf you operate to request the exercise of your rights. We will assess the validity of your claim before processing any request.

## 9. How do We keep information secure?

We use security measures designed to protect against the loss, misuse, and alteration of the information under our control. For certain services, data transfers are encrypted during transmission. In addition, the information that we store is maintained and archived on secure, hardened servers that are hosted on industry-standard secured data centers. Access to this information is protected by multiple layers of controls, including firewalls, role-based access controls, authentication mechanisms, and monitoring. The information is backed up, and archives are stored in a secure location. Wematch is taking any reasonable action to keep your information safe. Nevertheless, Wematch's services and platform are provided on an "AS IS" basis, Wematch is not responsible for any damages to the information, or to the functionality of the Platform, caused by reasons beyond its control, such as force majeure, cyber-attacks, pandemics, strikes, etc.

**If you are sharing personal information with our Business Customers, through our Services or other means, we recommend reviewing their privacy practices to understand what information they collect and process about you, as well as the security measures they implement.**

## 10. International Transfers

Our services are web-based, and we strive to store and process your information on servers and databases located within your region/territory or in a country with equivalent data protection rules.

For example:

- **For US residents** – Most processing occurs in the United States and the European Union.
- **For EU/UK residents** – Most processing occurs in the United Kingdom and the European Union.

That being said, Wematch acts globally and has several 'legal entities' across the globe, which all take part in the group effort to provide the services and may require access to your personal information. In that regard, our sites are spread across the US, UK, France, Hong Kong and Israel.

Moreover, some of our services or operations are outsourced and may require storage or access from different locations. For example, we use a service provider for archiving purposes based in Canada (Global Relay). In such cases, where international transfers of Personal Information will be conducted, it shall be exercised according to applicable Data Protection Laws.

## 11. Miscellaneous

We recommend that you review this privacy policy periodically, as we may update it from time to time. Your actions via our Services and the Platform, as applicable, constitute your acknowledgment of the up-to-date privacy notice to the fullest extent permitted by law.

We may use the email address that you provide us, to send you messages about new features, Platform updates, service updates, etc. Some of the messages sent to your contact information may contain advertising content – You can easily opt-out from getting these messages by clicking the unsubscribe link following any opt-out instructions provided in that message.

Some Web browsers offer a "Do Not Track" ("DNT") signal. A DNT signal is an HTTP header field indicating your preference for tracking your activities on a service or through cross-site user tracking. Our Service and Platform do not respond to DNT signals.

For any other inquiries, please contact us at [privacy@wematch.live](mailto:privacy@wematch.live). We will do our best to reply within a reasonable time.

## 12. Cookies

We use cookies, along with other online identifiers and tools, on our Platform and Services (collectively referred to as "cookies").

Cookies are small text files sent by a web server to your web browser or app and stored locally on your device. They enable the server to recognize your browser across different pages and interactions.

We only use **necessary cookies** for operational purposes. These cookies are essential for the functionality and performance of the Platform and its features. Without them, certain services you request may not be available or function properly.

Some cookies are removed when you close your browser session, other cookies last for longer periods (persistent). You can view the expiry date of each cookie, through your browser settings. We may use cookies to remember your login details and make it easier for you to log in the next time you access the Platform. We use this type of cookies and Session Cookies for additional purposes, to facilitate the use of the Platform's features and tools, and to improve the user's experience with our Services.

You can find more information about cookies and other online tracking technologies through the following websites:

<https://www.consumer.ftc.gov/articles/0042-online-tracking>

[http://ec.europa.eu/igp/basics/legal/cookies/index\\_en.htm](http://ec.europa.eu/igp/basics/legal/cookies/index_en.htm)

In addition, you can also find additional information on how we use tracking technologies by reading the cookies section on your browser's settings.

For example, for those who use Google Chrome, go to Settings; Privacy and Security; Content settings; Cookies; see All cookies. For more information about the cookies we use, please see our [Cookie Table](#):

Type	Name	Purpose	Information Categories	Duration
Authentication	Firebase Authentication (Google)	<p>They are used to identify and authenticate the user.</p> <p>Firebase Authentication uses the information to enable end-user authentication and facilitate end-user account management. It also uses user-agent strings and IP addresses to provide added security and prevent abuse during sign-up and authentication.</p>	<p>The following may be collected:</p> <ul style="list-style-type: none"><li>• Passwords</li><li>• Email addresses</li><li>• Phone numbers</li><li>• User agents</li><li>• IP addresses</li></ul>	Session

This table will be updated from time to time, to a reasonable extent. Hence, temporarily, the table may lack a cookie, which has been added to the Platform. Nevertheless, any cookie used shall only be used for the described purposes.

## 13. Document Owner and Approval

### a. History Record

Action	Date	Edited By	Approved By	Version	Change
Created	19/05/2021	Shanny Elron	Shanny Elron	1	Created
Reviewed and updated	17/02/2025	Shanny Elron	Guillaume Tellez	2	updated
Reviewed and updated	12/06/2025	Mark Tubby	Shanny Elron	3	updated