

PRIVACY POLICY

CRESCO TECHNOLOGIES LTD

Effective Date: 02.06.2026 | Version 1.1

NOTICE

This Privacy Policy explains how CRESCO TECHNOLOGIES LTD collects, uses, stores, and shares your personal data when you use the Platform.

1. Introduction and Identity of the Data Controller

1.1 CRESCO TECHNOLOGIES LTD ("Company", "we", "us", or "our"), a company incorporated in the UAE under registration number 37097, is the data controller responsible for the processing of your personal data in connection with the digital platform (the "Platform").

1.2 This Privacy Policy ("Policy") describes what personal data we collect, for what purposes we use it, with whom we share it, how long we retain it, and what rights you have in relation to it. This Policy should be read together with the Platform's Terms of Use and Disclaimer, which are incorporated by reference.

1.3 For any questions, concerns, or requests relating to this Policy, please contact us at:

Email: info@joincresco.com

Registered Address: 4391ResCo-Work05, Floor. 43, Addax Port Office Tower, Al Rayfa Street, Abu Dhabi, Al Reem Island, United Arab Emirates

2. Scope and Applicability

2.1 This Policy applies to all personal data processed by the Company in connection with: (i) your registration and maintenance of an account on the Platform; (ii) your completion of the investment profiling and onboarding questionnaire; (iii) the connection of your Interactive Brokers account to the Platform; (iv) your interactions with Partner Advisors through the Platform; and (v) your browsing and use of the Platform's features and content.

2.2 This Policy does not govern the processing of personal data carried out by Partner Advisors, by Interactive Brokers LLC, or by any other third party operating under its own privacy framework. Identity verification and KYC/AML checks are conducted exclusively by Partner Advisors and Interactive Brokers, each acting as independent data controllers. Users are encouraged to review the privacy policies of all third parties with whom they interact through the Platform.

3. Personal Data We Collect

3.1 Registration Data

When you create an account on the Platform, we collect:

- your email address, verified by a one-time confirmation code sent at the point of registration;
- your account password, stored in encrypted form; and
- technical metadata associated with account creation, including device type, IP address, and timestamp.

3.2 Investment Profile and Onboarding Data

During the onboarding process, we collect the following categories of information as part of your Investment Profile:

- investment management preference (discretionary delegation or advisory approval);
- primary investment objective (e.g. capital preservation, income generation, long-term growth);
- investment time horizon;

- stated risk tolerance and behavioural risk preference, including your hypothetical response to a portfolio decline;
- level of overall investment experience and familiarity with specific product types, including equities, ETFs, bonds, derivatives, structured products, and alternative investments;
- the financial significance of the investment capital relative to your overall financial position;
- the approximate proportion of your total assets represented by the investment; and
- the primary source of investment funds (e.g. business income, employment income, investment returns, inheritance).

The Company does not collect identity documents, passport data, facial imagery, or any biometric information. Identity verification is the exclusive responsibility of Partner Advisors and Interactive Brokers, each of which operates its own independent KYC and AML procedures.

3.3 Portfolio and Transaction Data from Interactive Brokers

If you connect your Interactive Brokers account to the Platform, the following data is received and displayed in real time via the official IBKR Advisory Account API:

- portfolio holdings and current valuations;
- executed and pending transactions and trade history;
- account number and account holder name; and
- portfolio performance metrics as made available through the API.

This data is displayed on a read-only, real-time basis. The Company does not store portfolio or transaction data on its own servers. The Company does not access, store, or retain your Interactive Brokers login credentials, passwords, or personal access tokens.

3.4 Usage and Technical Data

When you access and use the Platform, we automatically collect:

- IP address, browser type, and operating system;
- pages visited, features used, time spent on the Platform, and clickstream data;
- device identifiers and session information; and
- cookie and tracking data, as further described in Section 10 of this Policy.

3.5 Communications Data

If you contact our support team by email or through the live chat function on the Platform, we retain the content of your communications and associated metadata for the purpose of resolving your enquiry and maintaining an accurate record of our interactions.

4. Legal Basis for Processing

As a technology platform without a financial services license, the Company processes personal data on the following legal bases applicable to its role as a software and infrastructure provider. The Company does not rely on financial regulatory obligations (such as AML or KYC requirements) as a basis for data processing, as those obligations rest exclusively with licensed Partner Advisors and Interactive Brokers.

Contractual necessity: Processing required to perform the agreement between you and the Company (i.e. the Terms of Use), including account creation, delivery of the investment profiling tool, display of connected portfolio data, and provision of AI-generated summaries. This is the primary legal basis for the majority of data processing carried out by the Company.

Legitimate interests: Processing undertaken to pursue the Company's legitimate business interests as a technology operator, including platform security and fraud prevention, detection of abuse, technical performance monitoring, and support of the commercial relationship with Partner Advisors — provided such interests are not overridden by your rights and freedoms.

Consent: Processing for optional activities where your prior consent has been obtained: specifically, the use of non-essential analytical and marketing cookies, and the sending of marketing and promotional communications. Consent may be withdrawn at any time without affecting the lawfulness of processing carried out prior to withdrawal.

5. Purposes of Processing

We process your personal data for the following specific purposes:

- Account creation and authentication: to register your account, verify your email address, and manage your login credentials.
- Investment profiling: to collect your investment preferences and generate an Investment Profile for use in matching you with suitable Partner Advisors and communicating your profile to your selected Partner Advisor.
- Platform delivery and personalisation: to display your connected portfolio data, AI-generated summaries, Partner Advisor information, and investment ideas relevant to your profile.
- Partner Advisor onboarding: to share your Investment Profile with the Partner Advisor you select, as part of the advisory relationship established by your advisory agreement.
- AI Summary generation: to produce anonymised portfolio analytics summaries using a third-party AI provider, for your informational use only.
- Customer support: to respond to your enquiries, resolve complaints, and maintain records of our interactions.
- Platform security and fraud prevention: to monitor for and detect unauthorised access, abuse, and security incidents.
- Compliance with applicable law: to comply with court orders, regulatory directions, or other legally binding obligations applicable to the Company in its capacity as a technology operator incorporated in the UAE.
- Marketing communications: to send platform updates, newsletters, and promotional content, subject to your consent given at registration.

6. Sharing of Personal Data with Third Parties

6.1 Partner Advisors

Upon your selection of a Partner Advisor and execution of an advisory agreement, your Investment Profile — comprising the information collected during the onboarding process as described in Section 3.2 — is shared with that Partner Advisor. Your selected Partner Advisor will also have visibility of your portfolio performance data, transaction history, active investments, and investment idea results through the CRM system, to the extent made available by your connected Interactive Brokers account. This data sharing is governed by and subject to the terms of your advisory agreement with the relevant Partner Advisor.

6.2 AI Provider (OpenAI)

Portfolio data is submitted to the OpenAI API for the purpose of generating AI Summaries. Prior to transmission, all data is anonymised: no personally identifiable information, account numbers, or individual-specific data is sent to OpenAI. The data is transmitted in the form of an anonymised portfolio description.

6.3 Interactive Brokers

Portfolio and transaction data is received from Interactive Brokers LLC through the official IBKR Advisory Account API. Interactive Brokers processes your account data pursuant to its own terms of service and privacy policy. The Company does not transfer personal data to Interactive Brokers; it receives and displays data from Interactive Brokers on a read-only basis.

6.4 Cloud Infrastructure Provider

User account data and platform operational data are stored on servers hosted by a major cloud infrastructure provider (currently Amazon Web Services or an equivalent enterprise-grade provider). All cloud providers engaged by the Company are required to maintain appropriate technical and organisational security measures consistent with industry standards. The specific hosting region will be confirmed and updated in this Policy upon infrastructure finalisation.

6.5 Analytics and Marketing Tools

The Platform uses third-party analytics and marketing tools, which may include services such as Google Analytics and similar platforms. These tools may collect usage data through cookies and similar tracking technologies. Please refer to Section 10 of this Policy and the Platform's Cookie Policy for further details.

6.6 Legal and Regulatory Disclosure

We may disclose personal data to competent governmental, regulatory, or judicial authorities if required to do so by applicable law, regulation, court order, or binding regulatory direction, or if we reasonably believe that such disclosure is necessary to protect the rights, property, or safety of the Company, its users, or the public.

6.7 Corporate Transactions

In the event of a merger, acquisition, restructuring, or sale of all or substantially all of the Company's assets, personal data held by the Company may be transferred to the relevant successor entity, subject to that entity assuming obligations substantially equivalent to those set out in this Policy.

6.8 No Sale of Personal Data

The Company does not sell, rent, license or otherwise commercially exploit your personal data to any third party for that third party's own independent commercial purposes unrelated to the services you have requested. For the avoidance of doubt, the sharing of your Investment Profile and portfolio data with a partner Advisor as described in Section 6.1. does not constitute a sale or commercial exploitation of your personal data. Such sharing is carried out exclusively to perform the contractual relationship that you have chosen to enter into with that Partner Advisor, based on your explicit selection of that Partner Advisor and your execution of an advisory agreement. Such Partner Advisor receives your data solely to provide the advisory services, which you have requested, and not any independent commercial purpose of its own unrelated to the performance of such advisory relationship.

7. International Transfers of Personal Data

7.1 Depending on the location of our cloud infrastructure provider, third-party service providers (including OpenAI), and Partner Advisors, your personal data may be transferred to and processed in countries outside the UAE. Where such transfers occur, the Company takes appropriate measures to ensure that they are carried out in compliance with applicable law, including by entering into data processing agreements with service providers incorporating appropriate contractual safeguards, and by selecting providers that maintain recognised international security certifications.

7.2 Partner Advisors are independent entities subject to their own legal frameworks. Where a Partner Advisor is located outside the UAE, the transfer of your Investment Profile and portfolio data to that Partner Advisor is governed by the terms of your advisory agreement, and you are encouraged to review the data protection provisions of that agreement.

8. Data Retention

8.1 The Company retains your personal data for as long as your account remains active and for such further period as is necessary to fulfil the purposes described in this Policy or to comply with legal obligations applicable to the Company in its capacity as a technology operator incorporated in the UAE.

8.2 Upon closure or termination of your account, account data and Investment Profile information will be retained for a period of five (5) years, after which it will be securely deleted or irreversibly anonymised. This retention period reflects the Company's legitimate interests in defending potential claims and maintaining records of completed contractual relationships, and is consistent with standard commercial practice for technology platforms under UAE law.

8.3 Communications data and support records are retained for a period of five (5) years from the date of the relevant communication, unless a longer period is required for the resolution of a pending dispute or legal proceeding.

8.4 Usage and technical data collected through cookies and analytics tools is retained for the periods specified in the Cookie Policy. Anonymised or aggregated analytics data may be retained indefinitely as it no longer constitutes personal data.

9. Data Security

9.1 The Company implements appropriate technical and organisational security measures designed to protect your personal data against unauthorised access, disclosure, alteration, loss, or destruction. These measures include encryption of data in transit and at rest, access control mechanisms, secure cloud infrastructure, and regular security assessments.

9.2 No method of data transmission or storage is entirely secure, and the Company cannot guarantee the absolute security of your personal data. In the event of a data security incident likely to result in a risk to your rights and interests, the Company will notify you and any relevant regulatory authority in accordance with applicable law.

9.3 You are responsible for maintaining the security of your account credentials. The Company strongly recommends the use of a strong, unique password and advises you not to share your credentials with any third party.

10. Your Rights in Respect of Your Personal Data

Subject to the conditions and limitations established by the ADGM and other applicable law, you have the following rights in relation to your personal data:

- Right of access: to request confirmation of whether we process personal data about you and, if so, to obtain a copy of that data together with supplementary information about our processing activities.
- Right to rectification: to request correction of any inaccurate or incomplete personal data we hold about you.

- Right to erasure: to request deletion of your personal data where it is no longer necessary for the purposes for which it was collected, subject to applicable retention obligations.
- Right to restriction of processing: to request that we limit the processing of your personal data in certain circumstances, for example while the accuracy of your data is contested.
- Right to data portability: to receive personal data you have provided to us in a structured, commonly used, and machine-readable format, where technically feasible.
- Right to object: to object to processing of your personal data where it is based on the legitimate interests of the Company, including for direct marketing purposes.
- Right to withdraw consent: where processing is based on your consent, to withdraw that consent at any time without affecting the lawfulness of prior processing.

To exercise any of the above rights, please submit a written request to info@joincresco.com. We will respond within thirty (30) calendar days of receipt, or within such shorter period as may be required by applicable law. We may request reasonable verification of your identity before processing your request.

11. Cookies, Analytics, and Marketing Communications

11.1 Use of Cookies

The Platform uses cookies and similar tracking technologies for the following purposes: (i) essential cookies required for the operation and security of the Platform; (ii) functional cookies that remember your preferences and settings; and (iii) analytical and marketing cookies used to understand how users interact with the Platform and to deliver relevant communications. A detailed description of the specific cookies used is set out in the Platform's separate Cookie Policy.

11.2 Non-Essential Cookies and Consent

Non-essential analytical and marketing cookies are placed only with your prior consent. You may manage your preferences through the consent management tool on the Platform and may withdraw consent at any time without affecting your ability to access core platform features.

11.3 Third-Party Analytics

The Platform may use third-party analytics services, which may include Google Analytics and similar tools. These services may process usage data on servers located outside the UAE. Please refer to the respective third-party privacy policies for further information.

11.4 Marketing Communications

By completing the registration process, you consent to receive marketing and promotional communications from the Company, including platform updates and relevant market information. You may withdraw this consent at any time by clicking the unsubscribe link in any marketing email or by contacting us at info@joincresco.com. Withdrawal of marketing consent does not affect receipt of transactional and account-related communications, which are sent on the basis of contractual necessity.

12. Minors

The Platform is intended solely for use by individuals who are at least 18 years of age. The Company does not knowingly collect personal data from individuals under the age of 18. If we become aware that personal data has been collected from a minor, we will take prompt steps to delete such data and close the relevant account. If you believe that a minor has registered on the Platform, please notify us at info@joincresco.com.

13. Changes to This Privacy Policy

13.1 The Company reserves the right to update this Policy from time to time to reflect changes in our data processing practices, applicable law, or platform features. Where any amendment is material, we will notify you by email or by a prominent notice on the Platform at least ten (10) days before the amendment takes effect, except where a shorter period is required by law.

13.2 Your continued use of the Platform following the effective date of any revised Policy constitutes your acknowledgement of the update. If you do not agree to the revised Policy, you must cease using the Platform and request account closure in accordance with the Terms of Use.

14. Governing Law and Dispute Resolution

This Policy and any dispute arising out of or in connection with it shall be governed by and construed in accordance with the laws of the ADGM. Any dispute that is not resolved through the complaints procedure set out in the Terms of Use shall be referred to binding arbitration in accordance with the dispute resolution provisions of the Terms of Use.

15. Contact Us

For any questions, concerns, or requests relating to this Privacy Policy or our data processing practices, please contact:

Data Controller: CRESKO TECHNOLOGIES LTD

Registered Address: 4391ResCo-Work05, Floor. 43, Addax Port Office Tower, Al Rayfa Street, Abu Dhabi, Al Reem Island, United Arab Emirates

Email: info@joincresco.com