REDEFINING VALUE | CREATING CLARITY

Claryss Privacy Notice

Last updated: 12 October 2026

1. General information

Your privacy is important to us. All personal data will be protected in accordance with applicable data protection laws, which includes the General Data Protection Regulation ("**GDPR**") and the Dutch GDPR Implementation Act.

This Claryss privacy notice (the "**Privacy Notice**") explains how Fin-Es B.V. (trading as and hereinafter referred to as "**Claryss**", or "**we**", "**our**", "**us**") manages your personal data. This includes your interactions with us, your visits to our website (www.claryss.com), using our Claryss software-as-a-service platform as an authorised user, or doing business with us. It also explains how you can exercise your privacy rights.

The current version of this Privacy Notice is the only version that applies, until a new version replaces it.

Should you wish to contact us regarding this Privacy Notice, please use the contact information provided at the end of this document.

2. About Claryss

Fin-Es B.V is trading under the name Claryss. Fin-Es B.V. is a private limited liability company established in the Netherlands and registered with the Dutch Chamber of Commerce under number 97693758. We provide financial analytics, specifically through the exploitation of a financial analytics platform built for professional clients.

3. Who is responsible for processing your personal data?

Fin-Es B.V. acts as the "Data Controller" with regard to the processing of personal data for the purposes described below. This means that we are responsible for processing personal data in accordance with applicable data protection laws, including the GDPR.

4. The legal basis we rely on

Under the GDPR, we must always have a valid legal reason to process your personal data. Depending on how you interact with us, we rely on one of the following legal bases:

- **Contractual necessity:** To perform our agreement with our institutional clients, which includes managing individual user access, handling support requests, transmitting service updates, and executing event registrations.
- **Legitimate interests:** To maintain platform security, verify regulatory compliance, follow up on professional inquiries, manage event evaluations, and engage in professional business-to-business (hereafter 'B2B') marketing to existing clients and professional contacts regarding similar services, provided these interests do not override your fundamental privacy rights.
- **Consent:** Where you have given us clear and explicit permission for a specific purpose, such as subscribing to our newsletter or, where our website or platform uses them, accepting marketing and tracking cookies.

© 2026 Fin-Es B.V. · Claryss® is a registered trademark in the Benelux and certain other jurisdictions.

5. What data do we process and for what purpose(s)?

Our services are strictly intended for professional, B2B use. We only process professional personal data relating to individuals representing or working for our institutional clients, prospects, and website visitors. Below you will find an overview of the categories of personal data we process, the purposes for which we use them, and the applicable legal grounds under the GDPR:

Type of Data	Specific data	Purposes of Processing	Legal Basis (GDPR)
Professional Identity, Verification & Contact Data	Individual name, business email address, business telephone number, job title and company name.	To register and manage user accounts, provide technical customer support, and verify that the user is authorised to represent an institutional client that qualifies as a professional client with applicable financial regulations (such as MiFID II).	Contractual Necessity / Legitimate Interests
Account Credentials	Unique usernames, passwords, and secure access tokens.	To authenticate users, secure platform access, and prevent unauthorised use or account sharing.	Contractual Necessity
Technical & Usage Logs	IP addresses, login timestamps, browser type, interaction logs, and platform activity (including rate-limiting metadata).	To maintain network and platform security, monitor fair use, diagnose technical bugs, and optimise website performance.	Legitimate Interests
Support, Feedback & Inquiry Data	Name, business email address, business telephone number, company name, and the specific contents of your support request or feedback.	To process and respond to your requests submitted via our support and feedback forms, troubleshoot user issues, and contact you via phone or email to resolve queries.	Contractual Necessity / Legitimate Interests
Custom Universe Data (where enabled)	Lists of instruments and weights submitted by an authorised user to define a custom universe.	To compute outcome of our platform for that universe with the same methodology as for all other universes. The output depends only on the list submitted: identical lists give identical output, and no recommendation or suitability assessment is made.	Contractual Necessity
Event Registration Data	Individual name, business email address, business telephone number, job title, company name, and specific event preferences.	To process your registration for events, manage attendance lists, communicate practical event information, and provide relevant follow-up.	Contractual Necessity / Legitimate Interests
Client Relationship &	Individual name, business email	To advise you through email, phone calls, or post, in the context of our	Legitimate Interests

B2B Marketing Data	address, business telephone number, professional postal address, and business relationship logs.	commercial relationship, about other products or services similar to the services we have provided to you and that we think will be of interest to your organisation. You can opt out of these communications at any time.	
Newsletter Subscriber Data	Business email address and newsletter interaction data.	To send you commercial newsletters containing updates about our company, products, and services, where you are not yet an existing client but have opted in. You can unsubscribe at any time via the link provided in our emails.	Consent / Legitimate Interests
Marketing & Tracking Data	Unique cookie IDs, browsing behaviour, clicked links, and interaction history on our website.	Where our website or platform uses such cookies: to analyse how our website is used, measure the effectiveness of our campaigns, and tailor content to your professional interests, provided you have accepted these cookies.	Consent

Client onboarding and eligibility verification. In connection with account registration and ordering we process the business contact details of client representatives together with: the client category declared for the client's jurisdiction; evidence of that category (such as extracts from public regulatory registers, financial statements, or signed attestations and certificates where required); records of electronic acceptance of our terms; and, where an order is declined, a record of the refusal. Purposes: verifying and documenting that the client qualifies as a professional client under the rules of its jurisdiction, and maintaining a compliance record. Legal bases: our legitimate interests in serving professional clients lawfully and in demonstrating compliance, and compliance with legal obligations where verification is required by law.

Sanctions and export-control screening. We screen the contracting entity and, where applicable, its representatives and disclosed owners against applicable sanctions lists (including the EU consolidated list and, for US-facing business, the OFAC lists), in connection with onboarding and on an ongoing basis during the client relationship. Purposes: compliance with sanctions and export-control laws that bind Fin-Es directly. Legal bases: compliance with a legal obligation, and our legitimate interests in preventing prohibited transactions. Screening outcomes may require us to refuse or suspend a transaction, or to freeze funds, including where a party is designated after onboarding, where the law so requires.

6. What happens if you choose not to provide your data?

Where we need to collect personal data under the terms of a contract we have with your organisation, or to comply with statutory and financial regulations, providing this information is required. If you choose not to provide the requested personal professional data, it may prevent us from executing our contract or delivering our services effectively. Consequently, we may not be able to activate your individual user account, provide you with technical support, grant you access to Claryss platform, or register you for our specific corporate events and website activities.

7. Sharing personal data

We do not sell your personal data. We only disclose or share your data with trusted third parties when strictly necessary to deliver our services or comply with our obligations:

- **Data processors:** We engage reliable third-party service providers (such as cloud hosting, security, venue management for events, CRM/marketing mailing tools, accounting software, and IT management providers) who process data strictly on our instructions and under signed Data Processing Agreements (DPAs).
- **Upstream licensors:** We may share basic identity or platform usage data of authorised users with our data providers (such as S&P Global) for mandatory compliance, upstream reporting, and usage verification purposes. S&P Global Market Intelligence LLC (55 Water Street, New York, NY 10041, United States of America) processes this data as an independent data controller. Its processing of personal data is described in the S&P Global Corporate Privacy Policy, available at https://www.spglobal.com/en/privacy/privacy-policy-english.
- **Legal authorities:** We may disclose your data if we are required to do so by mandatory law or a competent judicial authority.

8. Self-Service Account Management

If you are an authorised user with an active account on Claryss platform, you do not need to submit a formal privacy request to update your day-to-day profile data. You can access, review, modify, or correct most of your personal professional data (such as your name, business email address, and communication preferences) directly through your personal account settings on the platform.

For changing the personal information of the accountholder, please contact us using the details below.

9. Artificial Intelligence (AI) and machine learning

In line with our upstream licence obligations, no portion of the third-party data services licensed by us for Claryss platform (including S&P Global data services) is used in conjunction with any artificial intelligence or machine-learning model or system. In strict compliance with the confidentiality and our terms and conditions, we do not use your personal data or any customer-uploaded data to train, validate, or fine-tune public or third-party artificial intelligence or machine learning models.

10. Processing & Storage of data

We process personal data electronically as well as manually in accordance with the above-mentioned purposes. Only authorised personnel and third-party processors have access and are appropriately designated and trained to process your data.

As a Dutch entity, personal data is primarily stored and processed within the European Economic Area (EEA). If any of our service providers or upstream licensors process data outside the EEA, we ensure that appropriate safeguards (such as the EU Standard Contractual Clauses) are in place to guarantee an equivalent level of data protection. In particular, personal data of authorised users and relevant contact persons is transferred to S&P Global Market Intelligence LLC in the United States of America on the basis of the EU Standard Contractual Clauses (Module One, controller to controller) incorporated in our agreement with S&P Global.

11. Data retention

We retain personal data and website user logs only as long as necessary to fulfil the purposes for which they were collected, or as long as required by statutory law. Eligibility evidence, acceptance records and screening outcomes are retained for the duration of the client relationship and thereafter for as

long as applicable limitation periods and regulatory expectations require us to demonstrate compliance.

Upon termination or expiry of the agreement with the institution, individual user access credentials are deactivated. Any downloaded data by the user, or cached platform data, must be permanently deleted by the user, and we will delete the corresponding personal data from our live production systems. Personal data may persist for a limited period in routine encrypted backups, which are overwritten on a rolling basis, and we may retain specific records where mandatory retention laws (such as Dutch fiscal record-keeping obligations) require it.

Data collected for B2B marketing purposes or newsletter subscriptions will be retained until you opt out or object to the processing. Data collected for event registrations will be removed shortly after the event and its follow-up communications are completed, unless a continuous business relationship exists.

12. What are your data protection rights?

We want to make sure you are fully aware of all your data protection rights under the GDPR. Every user is entitled to the following:

- The Right to Access: You have the right to request copies of your personal data from us.
- The Right to Rectification: You have the right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- The Right to Erasure: You have the right to request that we erase your personal data, under certain conditions.
- The Right to Restrict Processing: You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The Right to Data Portability: You have the right to request that we transfer the data we have collected to another organization, or directly to you, under certain conditions.
- The Right to Object: You have the right to object to the processing of your personal data. You have an absolute right to object to the processing of your data for direct marketing purposes at any time.
- The Right to Withdraw Consent: If the processing is based on your consent (e.g., non-client newsletters or marketing cookies), you have the right to withdraw that consent at any time.
- The Right to Complain: If you are not satisfied with how we handle your personal data, you have the right to file a complaint with the appropriate supervisory authority, such as the Dutch Data Protection Authority (in Dutch: *Autoriteit Persoonsgegevens*).

If you reach out to us to exercise your privacy rights, ask a question, or lodge a complaint, we will need to process some of your personal information. We do this to verify your identity, handle your request properly, and guide our communication with you. We also keep a formal record of how the matter was resolved. We do this to meet our legal obligations and to ensure we have accurate regulatory compliance records.

If you make a request, we have (30) thirty days to respond to you. If you would like to exercise any of these rights, please contact us using the details below.

13. Contact Details

If you have any questions, concerns or complaints, please contact us at contact@claryss.com.