

Marex is committed to protecting your personal information in accordance with applicable data protection laws, including the Act on the Protection of Personal Information (“**APPI**”).

This Privacy Policy applies to personal information that is collected, used, disclosed and handled by us in connection with our activities in Japan. It explains how we may collect, use, disclose and handle personal information, including in the following cases:

- you have had contact or interacted with us for business purposes, including in connection with products and services provided by us (collectively the “**Services**”), or where applicable, any of the Marex Group Entities (as defined below);
- you use Marex Group’s (as defined below) websites that link to this Privacy Policy, such as marex.com or neon.markets (collectively “**Sites**”);
- your personal information is provided to us by any of the Marex Group Entities or other parties such as service providers, a customer or vendor of any of the Marex Group Entities, or other organisations;
- you otherwise interact or engage with us such as when you visit our premises, attend our events, or submit information to us.

Please refer to our **Cookie Policy** which provides information about our use of cookies via the Sites.

This Privacy Policy supplements and does not supersede or replace any specific terms and conditions which may be applicable to your relationship with us or which may govern how we collect, use, disclose and process your personal information, and any consents you may have previously provided to us.

In this Privacy Policy:

- “**individual number**” has the meaning given to it under the *Act on the Use of Numbers to Identify Specific Individuals* in Administrative Procedures;
- “**Marex**”, “**Marex Group**”, “**we**”, “**our**” or “**us**” means Marex Group Limited and its subsidiaries, including Marex Japan Limited. Please see here for a list of Marex Group Entities;
- “**Marex Group Entity**” means any entity within the Marex Group, and “**Marex Group Entities**” shall be construed accordingly;
- “**personal information**” has the meaning given to it in the APPI; and
- “**you**” or “**your**” means any persons with whom we interact with or whose personal information we collect, use, disclose or handle, including visitors, customers, vendors, partners, contractors and third parties whose personal information is provided to us.

We transfer personal information internally, including to the United Kingdom. For more information, please read the section of this Privacy Policy relating to the transfer of our personal information, or visit [here](#) to read how we process your

personal information under the General Data Protection Regulation 2016/679 (“GDPR”), the UK GDPR and other applicable privacy laws.

1. Who is responsible for your personal information?

Our Sites and our Services are made available by various companies in the Marex Group. Where this Privacy Policy refers to “Marex”, “we”, “us” or “our” this means one or more of the Group Companies that provide the Site or Services to you, including Marex Japan Limited.

2. How does Marex collect and handle your personal information?

We may collect and use personal information about you or relating to you in various ways, including the following:

- if you register to become a customer of the Services provided by us or where applicable, a Marex Group Entity;
- if you are an employee or are otherwise related to, affiliated or associated with (e.g. directors, representatives, employees, shareholders, beneficial owners, authorised persons, persons exercising control) an organisation that is or registers to become our customer or where applicable, a customer of a Marex Group Entity, then that organisation may submit your personal information to us. Similarly, if you are a customer of an introducing broker, the introducing broker may disclose your personal information to us;
- from any of your or your organisation’s activities in connection with your or your organisation’s use of the Services provided by us or a Marex Group Entity (where applicable), and interaction with us or a Marex Group Entity;
- if you send us a message or correspond with us by telephone, in writing or otherwise;
- administering and operating customer accounts;
- when you are within our premises or when you attend events hosted, facilitated or sponsored by us or where applicable, a Marex Group Entity;
- from any of the Marex Group Entities;
- through cookies and other technologies, as you visit the Sites. For more specific information about our use of cookies and web technologies, please see our **Cookie Policy**;
- from third parties, such as exchanges, banks, analytics providers, data brokers, third party directories, business partners, vendors, our corporate customers or other contractual parties;
- from publicly available sources (such as media reports, online registers or directories) or that you or a third party may otherwise make publicly available (for example through speeches at events, publishing articles, other news stories, or on social media platforms); and

- when you send your personal information to us for any other reason or if your personal information is provided to us by third parties (such as agents, vendors, contractors or business partners).

If you provide personal information of another individual to us, (a) you represent and warrant that you are legally entitled or authorised under applicable laws to provide their personal information to us, and for us to collect, use, disclose and handle that personal information in accordance with this Privacy Policy, and (b) you shall provide accurate and complete personal information, and keep us informed of any changes. Failure on your part to do so may prevent us from providing you with the products and services you have asked for.

To serve you better, fulfil our legal obligations, and to detect and prevent fraud, we may combine information obtained through various channels.

We will not, unless permitted by laws and regulations, acquire, use or provide to third parties any Sensitive Information (Sensitive Personal Information and information related to labor union membership, family origin, registered domicile, healthcare, etc.) as defined in the Guidelines Concerning Personal Information Protection in the Financial Industry, etc.

3. Purpose of Use

Except where we obtain your consent or when handled as an exception as permitted under the APPI and applicable data protection laws, we will use your personal information within the scope necessary to achieve the following purposes:

- Provision of our Services to you or to your organization including onboarding you as a client;
- Security of our premises, IT, online platforms, Sites, communication and other systems and the detection of security threats and of other malicious activities;
- To monitor and assess compliance with our internal policies and standards;
- Identification of authorized persons to trade on behalf of our clients, suppliers or service providers;
- Fulfilment of our payment obligations to our suppliers and/or service providers;
- Administration of your Marex account;
- Ensuring compliance with our legal obligations to prevent and investigate fraud and other market abuse behaviour by monitoring our communications with you, as well as to ensure compliance with court orders and to exercise/defend our rights;
- Host and management of our events.

4. Purpose of use of individual numbers

Where we collect individual numbers, we will only handle them to the extent permitted by the Act on the Use of Numbers to Identify Specific Individuals in Administrative Procedures, and notably to carry out payment records related to remuneration, fees, and other legally permitted uses.

5. Transfer of personal information

We might share your personal information for the sole purpose of delivering our Services to you according to the legislative guidance. This may include entrusting the handling of

personal information to service providers that handle personal information on our behalf. Where we entrust such handling, we put contractual arrangements and security mechanisms in place and will supervise these service providers appropriately to ensure the secure handling of personal information for the specific purposes for which it was entrusted, as consistent with this Policy and the applicable data protection laws.

We may share your personal information in the following circumstances:

- between the Marex group companies on a confidential basis where required for the purposes of providing the Services to you and for administrative, billing and other business purposes;
- with any third party to whom we assign or novate any of our rights or obligations, including in possible sale of the Marex Group or any of its assets, shares or entities;
- with third party service providers (such as those who provide applications, functionality, data processing or IT services) who handle personal information on our behalf and in accordance with our instructions;
- with courts, law enforcement authorities, auditors, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, for the purposes of a confidential alternative dispute resolution process, or to seek advice and assistance in relation to the lawful and effective management of our business;
- with payment providers and banks;
- with event partners and suppliers;
- with other third parties, for instance to comply with requests from third parties with authority to obtain disclosure, to investigate an alleged crime, or to establish, exercise or defend legal rights.

Otherwise, we will only disclose your personal information:

- when you direct us;
- where we are required by the APPI to obtain consent for provision to a third party and such consent has been obtained;
- where we are required to do so by applicable law or regulation or judicial or official request;
- where necessary to investigate actual or suspected fraudulent or criminal activities.

6. Joint use of personal information

To the extent permitted by the APPI, we may jointly use your personal information with other Marex Group Entities ([see here](#)) for the same purposes and same personal information categories as described in this Privacy Policy. When jointly using personal information, we may disclose the following categories of personal information:

- **Identity data**, such as: Your first and last name;
- **Contact data**, such as: Your billing address; email address; and telephone number;

- **Registration data**, such as: Your first name; last name; date of birth; gender; country; nationality; username; any KYC information that we may collect; any other personal information that you may provide when you register an account with us;
- **Financial data**, such as: Your bank account details; partial payment card details;
- **Transaction data**, such as: Details about payments made between you and us; details of Services purchased from us;
- **Profile data**, such as: Your account username; password; contact preferences; feedback and survey responses; the content of any messaging you send using any enquiry form on the website;
- **Communication data**, such as the content of any messages, emails or calls made to us;
- **Technical data**, such as: Your Internet protocol (IP) address used to connect your computer to the Internet; your login information; browser type and version; time zone setting; your ISP and/or mobile carrier; browser plug-in types and versions; and
- **Marketing data**, such as: Your marketing preferences; service communication preferences;
- **Video, audio and physical access data**, such as: CCTV and video recordings and details of your visit to our premises;
- **Other data**, such as: any other personal information we receive from you or on your behalf or from any third party.

Marex Japan Limited, located at Roppongi 1-4-5 Ark Hills South Tower 9F, Minato-ku, Tokyo 106-0032 serves as your primary point of contact and is responsible for the management of such personal information related to joint use. You can contact our Data Protection Officer by emailing DataProtectionOffice@marex.com.

7. Handling of personal information outside of Japan

Marex Group is a diversified global financial services platform. We may need to transfer personal information within the Marex Group and to third parties, outside of Japan, in connection with the provision of our Services to you. Where applicable, we rely on APPI Article 28 by transferring to (i) countries/regions designated by the PPC as having an equivalent level of protection, or (ii) recipients that have established appropriate and reasonable measures to ensure the continuous protection of personal information; and we provide information about the foreign regime and safeguards upon request.

You may find further information on the protection regime of personal information in foreign countries to which we may provide personal information by referring to the link below:

<https://www.ppc.go.jp/personalinfo/legal/kaiseihogohou/#gaikoku>

You may also contact us for additional information about the safeguards applied to specific overseas transfers.

8. Keeping your personal information secure

The security of your personal information is important to us. We implement the necessary and appropriate measures to prevent the leakage, loss, or damage of personal information and to ensure its proper handling. These measures include maintaining internal rules for the secure management of personal information, managing access to systems and files, and applying controls appropriate to the form in which the information is retained (whether electronically or in physical documents). Our officers and employees receive appropriate guidance on the proper handling of personal information and are required to manage such information securely in the course of their duties. We erase or delete your personal information when it is no longer required.

9. Your rights

Under certain circumstances, subject to applicable laws, you have the right to:

- request notification of the purpose of use of your retained personal data;
- request access (disclosure) to your retained personal data;
- request correction, addition, or deletion of retained personal data that is inaccurate;
- request suspension of use or deletion, or suspension of provision to third parties, where your retained personal data has been handled in violation of the APPI; and
- contact us with questions or concerns regarding the handling of your personal information.

We will respond in accordance with the APPI and our internal procedures. To exercise your rights, you can contact our Data Protection Officer by emailing:

DataProtectionOffice@marex.com

If the GDPR applies to our processing of your personal data, please visit <https://www.marex.com/privacy-policy/> to view our UK/EEA Privacy Policy, which contains details about your rights under the GDPR. If you believe that you have additional rights under any other applicable laws and would like to exercise such rights, please contact our Data Protection Officer at the contact details set out in this Privacy Policy.

After confirming that the request is from you, except where disclosure, etc. is not required under laws and regulations, we will respond within a reasonable period of time and to an appropriate extent. In such cases, we may request payment of prescribed fees.

10. Contact details & Complaints

If you have any questions regarding our handling of personal information or wish to exercise your rights as set out in this Privacy Policy please contact Data Protection Officer at DataProtectionOffice@marex.com.

Marex Japan Limited is a member of the Japan Securities Dealers Association (JSDA), which is a Certified Personal Information Protection Organization (CPIPO) in Japan. The JSDA Personal Information Consultation Office also handles complaints and inquiries regarding the handling of personal information by its member firms.

Japan Securities Dealers Association

Personal Information Consultation Office

Tel: (03-6665-6784)

11. Updates to this Notice

This Privacy Policy was last updated in March 2026. We reserve the right to update and change this Privacy Policy from time to time, to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we will post the updated Privacy Policy on the Website or publish it otherwise. The changes will take effect as soon as they are published.