REAL MONEY EUROPE

Precious Metals Dealer

PRIVACY NOTICE

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

This notice explains, in simple terms, what personal data we collect, why we use it, who we share it with, and what rights you have as a client or visitor to our website. If you have any questions, you can always write to us at privacy@realmoneyeu.com.

1. Who We Are

Real Money Europe Limited ("Real Money Europe", "we", "us") is the Data Controller for your personal data. We operate in the field of physical gold and other precious metals intermediation and custody.

Company name	Real Money Europe Limited
Registered office	Block 4 Harcourt Centre, Harcourt Road, Dublin 2, D02 HW77, Dublin, Ireland
Company Number	813181
Privacy contact	privacy@realmoneyeu.com
Website	www.realmoneyeu.com

2. What Data We Collect

We collect different categories of data, depending on how you interact with us:

Data category	Examples
Identification data	First and last name, date and place of birth, residential address, identity document, tax code or equivalent
Contact data	E-mail address, phone number, address
Financial and KYC/AML data	Source of funds, bank details, purchase/sale/custody transactions, information collected for anti-money laundering purposes
Browsing data	IP address, device and browser type, pages visited on the website (see also our Cookie Policy)
Communications	Emails, messages and other communications you send us (e.g. support requests)

3. Why We Use Your Data and on What Legal Basis

Purpose	Legal basis (GDPR)
Managing our relationship with you: opening and managing your account, carrying out purchases, sales and gold custody	Performance of a contract (Art. 6.1.b)
Complying with anti-money laundering obligations (KYC/AML), including checks and any reports to the competent authorities (FIU Ireland, AMLCU, Revenue Commissioners)	Legal obligation (Art. 6.1.c)
Responding to your requests and providing support	Performance of a contract / legitimate interest (Art.

Purpose	Legal basis (GDPR)
	6.1.b, 6.1.f)
Protecting our systems and preventing fraud	Legitimate interest (Art. 6.1.f)
Sending you commercial or promotional communications	Consent (Art. 6.1.a) — only if you have agreed to it, and can be withdrawn at any time

4. Who We Share Your Data With

We do not sell your data to anyone. We only share it when necessary, with:

- Our IT systems, administrative services and compliance service providers, which process data on our behalf;
- the LBMA refineries and depositaries where the physical gold is held in custody, limited to what is necessary for custody purposes;
- the competent authorities where required by law (FIU Ireland, AMLCU, Revenue Commissioners, Data Protection Commission);
- professional advisors (lawyers, accountants) where necessary for the provision of our services;
- payment service providers and banking institutions, for the execution of transactions.

All providers that process data on our behalf are bound by a data processing agreement (DPA) compliant with Art. 28 of the GDPR.

5. How Long We Keep Your Data

Type of data	Retention period
KYC/AML data and transaction records	5 years from the end of the relationship, as required by Irish anti-money laundering legislation
Account and contractual data	For the duration of the relationship, plus any further period required to meet subsequent legal obligations
Data collected with your consent (e.g. newsletter)	Until consent is withdrawn
Website browsing data	As set out in our Cookie Policy

6. Your Rights

As a data subject, you have the following rights over your personal data:

- Access: find out what data we hold about you and how we use it;
- Rectification: ask us to correct inaccurate or incomplete data;
- Erasure: ask us to delete your data, within the limits provided for by law;
- Restriction: ask us to temporarily limit the use of your data;
- Portability: receive your data in a structured, transferable format;
- Objection: object to processing based on legitimate interest;
- Withdrawing consent: withdraw, at any time, consent previously given (e.g. for marketing), without affecting the lawfulness of processing carried out before the withdrawal.

Some of these rights cannot be exercised over data processed to comply with legal obligations, such as KYC/AML data: anti-money laundering legislation requires us to retain it for the prescribed period, regardless of any request *for erasure.*

To exercise any of these rights, please write to us at privacy@realmoneyeu.com. We will respond as soon as possible and in any case within the timeframes required by law.

If you believe that the processing of your data does not comply with applicable legislation, you have the right to lodge a complaint with the Data Protection Commission (DPC), the Irish supervisory authority, or with the authority of your country of residence.

7. Transfers of Data Outside the EU

Your data is processed primarily within the European Union and the European Economic Area. Should we need to transfer data to third countries for operational reasons, we would only do so where appropriate safeguards required by the GDPR are in place (such as European Commission adequacy decisions or standard contractual clauses).

8. How We Protect Your Data

We adopt appropriate technical and organisational measures to protect your data from unauthorised access, loss or improper disclosure, including encryption, access controls and continuous monitoring of our systems. For further details, please refer to our Privacy Risk Management Policy, available on our website.

9. Updates to This Notice

We may update this notice from time to time, for example in the event of regulatory changes or changes to our services. The most up-to-date version is always available at www.realmoneyeu.com in the “Privacy” section. We encourage you to review it periodically.

Last updated: August 2026