

## **SimpleFX Ltd. Privacy Protection Policy**

The SimpleFX Ltd. Privacy Protection Policy (hereinafter referred to as: “the Policy”) is applicable since 24th May 2018. Previous version of Privacy Notice of 1st of April 2014 is not being in force since above date. We may make it accessible for You only based on Your justifiable request. Subject to provisions applicable only to the Users (individuals and legal entities) who are in European Union (hereinafter referred to the: ‘EU’), the Policy is applicable also to Users from non-EU countries, and regardless of User’s place of residency/ registered offices in relation to legal entities and provides the appropriate technical and organisational measures to ensure a level of security appropriate to the risk at the same level like those applicable to Users from EU countries.

SimpleFX Ltd. is owner of online trading platform and makes any effort to protect the privacy of people using its services.

In order to implement the principle of lawful, reliable and transparent processing of your personal data while using our services, we accept a document called Privacy Policy.

Privacy Policy determines how we look after your personal data and your rights.

The Policy shall enter into force on 24th May 2018, however the provisions hereof entailed with the Subscription of the newsletter from the blog about the cryptocurrencies shall be applicable since 23rd October 2018, as well the provisions hereof referring the creation of User’s public profiles in default and data processing within scope of sharing the Trading Ideas which shall be applicable since 20th February 2019.

### **1. WHICH DEFINITIONS WE USE IN THE PRIVACY POLICY?**

**SimpleFX, We, Our, Us** – SimpleFX Ltd. Suite 305, Griffith Corporate Centre P.O. Box 1510, Beachmont Kingstown, St. Vincent and the Grenadines .

**Account** – a set of resources and settings created for the User as part of the Services used to manage the services.

**Our Clients** – individuals who are Users of the SimpleFX, which SimpleFX provides offering trading Services with Forex CFDs (contract for difference) trading services on Bitcoins, Litecoins, indices, precious metals and energy.

**Entities** – legal entities (mainly companies regardless of the legal form or jurisdiction) who are corporate Users of the SimpleFX, which SimpleFX provides offering trading Services with Forex CFDs (contract for difference) trading services on Bitcoins, Litecoins, indices, precious metals and energy.

**Profile** – the functionality of the Account, allowing the User to collect selected information.

**Terms of Use** – Terms of Use and Customer Agreement. Current version of text you will find [here](#).

**AML Policy** – Policy for preventing Money Laundering and Terrorism Financing SimpleFX Ltd., which determines the operational activities undertaken by the Company are carried out in full compliance with applicable anti - money laundering legislation and regulations issued by the competent authorities, each part of the country in which the Company operates, refusing to engage in suspicious transactions in terms of fairness, transparency, ethical business and starting relationships with financial and trade counter-parties, suppliers, partners, contractors and consultants, only after checks on the information available relating to their respectability and the legitimacy of their activity, so as to avoid any implication in operations able, even potentially, to favour the laundering of money from illegal or criminal activities, and acting in full compliance with internal Compliances and AML procedures and anti - money laundering legislation.

**Customer Due Diligence Procedure** – Customers Due Diligence Procedure for SimpleFX Ltd., which determines the measures essential to the management of money laundering and terrorist financing risk, aiming at identifying of the Users and in certain circumstances their source of funds as well their true identity on the basis of documents or information obtained from reliable and independent source.

**GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and

on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

**Representative** - B.N. Quantum Simple Technologies Holdings Ltd Camelia Court 204, 13 Pinelopsis Street, Limassol, Cyprus, which represents SimpleFX within the territory of EU with regard to their respective obligations under GDPR.

**Website or Services** – websites belonging to SimpleFX, within which SimpleFX provides its services.

**Settings (Privacy)** – functionality of the Account, allowing the User using selected Services to properly manage these Services, including independent modification of their scope and selection of preferences regarding the protection of their privacy.

**User** – an adult natural person or legal entity who has an verified Account and uses the services offered by SimpleFX on the Services.

**non-verified User** – natural person or legal entity who uses the Services offered by SimpleFX on websites that do not require the verified Account.

**non-logged-in User** – natural person or legal entity who uses the Services offered by SimpleFX on websites that do not require the Account.

**You, Yours** – respectively User or non-verified User or non-logged-in User.

In Policy, we also use the names of individual Services and functionalities of the Account (e.g., Affiliate program) that have been defined and described in detail in the Terms of Use.

## **2. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND HOW YOU CAN CONTACT WITH US?**

SimpleFX is the Controller of Your personal data in connection with the use of the Services.

If you have any questions regarding the processing of your personal data and your rights, please contact Us:

- a) via Our <https://simplefx.com/support> with Data Protection as the subject of mail or
- b) with Our Data Protection Officer: by e-mail to the following address: [dpo@simplefx.com](mailto:dpo@simplefx.com).

### 3. WHAT PERSONAL DATA WE PROCESS, IN WHICH PURPOSES AND ON WHAT LEGAL BASIS?

Due to the fact that We provide Services for Users and Users not logged in, which requires different type of data, We process your personal data for various purposes, to a different extent and on a different legal basis set out in the GDPR. In order to provide You with the most transparent information, We have grouped this information referring to the purpose of processing Your personal data.

#### Creating an Account and User authentication on the Services

**The scope of data.** For this purpose, we process personal data provided by You in the registration form for the Services, i.e. the email address, Username (in default an username contains the content of Your email e.g. name and surname or any other content introduced by You to Your email address) and the password You set, Your localization, Your IP; session data; Your device and operating system, browser, location and unique ID. If you register for the Services via an external authentication service (e.g. Facebook Connect, Google Sign-In, Twitter), we also collect Your name and surname and `is_valid`, `user_id`, the email address being used in an external authentication service, as well Your avatar, which is downloaded on Our cloud storages.

**Legal basis:** Processing is necessary for the performance of a contract for the provision of electronic services to which the User is party, or in order to take steps at the request of the User prior to entering into the contract [Article 6 (1b) GDPR].

## Services that do not require creating an Account

**Types of Services:** We process Your personal data to provide services that do not require the creation of an Account, such as: demo trade (simulation of single CFD), exploring the Website, its menu and its tabs; download the pdf. documents provided by SimpleFX; download MetaTrader4 application; watching education materials via an external authentication service (e.g. YouTube); enclosing of a job application if the recruitment process is carried out .

**The scope of data:** To this end, We process personal data about Your activity on the Services, that is: session data, Your device and operating system, browser, location and unique ID; Your localisation, Your IP; in terms of enclosing of job application We also see Your email as well all data provided in Your CV and Your application letter including employment and career history, information which relates to Your the education and any professional training, via an external authentication service (e.g. Your email account provider).

**Legal basis:** Processing is necessary for the performance of a contract for the provision of electronic services [Article 6 (1b) GDPR] and in respect of job application (and the other data provided by You), we process Your personal data based on the User's consent to the processing of his or her personal data for the purpose of recruitment process [Article 6 (1a) GDPR].

## Subscription of the newsletter from the blog about the cryptocurrencies

**Types of Services:** Subscription of the newsletter from <https://blog.simplefx.com/> does not require the creation of an Account. After subscribing the newsletter You will receive the spam concerning summary of most interesting articles; promotions of products or services rolled out by the Our authorised counterparties, as well trading promotions announced by Us.

**The scope of data:** To this end, We process Your localisation; Your IP; Your email - if it contains Your name and surname.

**Legal basis:** Subscriber's consent to the processing of his or her personal data for the purpose of subscribing newsletter [Article 6 (1a) GDPR].

## Services and functionalities requiring creation the Account

**Types of Services and functionalities.** We process your personal data to provide services that require Account creation, such as: tutorial for beginners, Snapshots, Demo of live account; sharing Your trading forecasts or trading strategies by Using Trading Ideas functionality; send the email to the Customers Support or Partnership Department via contact form; using Shoutbox, where all User will see Your Username (default: name of Your email); our affiliate panel *unilink*.

**The scope of data:** To this end, We process Your personal data provided by You in the Profile and data about Your activity on the Services, that is: Your localisation; Your IP; Your email - if it contains Your name and surname; Your Username; Your password; if You register for the Services via an external authentication service (e.g. Facebook Connect, Google Sign-In, Twitter), we also collect Your name and surname in that way; as session data, Your device and operating system, browser, location and unique ID; user-generated content, posts and other content You submit to SimpleFX Sites; in terms of enclosing of job application We also see Your email as Well all data provide in Your CV and You application letter.

Providing some data is a prerequisite for using individual services and functionalities of the Account (mandatory data). Our system automatically means obligatory data. The consequence of not providing this data is the inability to provide certain Account services and functionalities. In addition to data marked as mandatory, providing other personal data is voluntary.

**Legal basis:** Processing is necessary for the performance of a contract for the provision of electronic services in accordance with the Terms of Use [Article 6 (1b) GDPR].

## Public or private User's profile?

We believe that active traders community provide the best value for for everyone focused on achieving the best trading results. For this purpose Your User's profile shall be created as the

Public Profile. When You share Your Trading Ideas, send the message on the Shoutbox, or creating a new trading analysis, the public profile feature will result in public disclosure of the following information: Joined (date of Your registration in the Platform), Messages (number of Your messages on the shoutbox), Followers (number of Users who follow You), Following (number of Users for which You follow). You are able to change Your profile privacy settings (i.e. change from Public to Private User's Profile any time as You wish). Please note that Your Trading Ideas could be the subject of affiliation referral link, which may be employed by Users' who use the 'unilink' panel to make the additional profits from completing their affiliations targets. The consequences of resignation from Public Profile are non-disclosure of the Joined, Messages, Followers, Following.

**Legal basis:** Processing is based on the User's consent to the processing of his or her personal data for the purpose of enhance the trading community [Article 6 (1a) GDPR] .

## **Services and functionalities requiring verification of the Account**

**Types of Services and functionalities.** We process Your personal data to provide Services that require Account creation, such as: verification of Account, making of deposit or a withdrawal; trading on the platform.

**The scope of data:** To this end, We process Your personal data provided by You during 'Know Your Customer Process' and data about Your activity on the Services, that is: Your localisation, Your IP, name, surname, citizenship, address, postcode, age, gender, ID, Your photography (selfie photo), email address, username, telephone number, user-account information, such as username and password, IP address; financial information; data concerning Your bank account as well other financial documents consisting Your personal data provided by You in case of situations set forth in Customers Due Diligence Procedure; any other personal information You voluntarily provide to SimpleFX. In terms of Entities We process all above-mentioned personal data regarding beneficial owners of an Entity, as well other personal data provided by You during verification process.

We may receive personal information about You from other legitimate sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties. The types of personal information that We may collect from such sources include Your: name; street address; age; Your commercial

activities; possessing the shares or interests in companies or partnerships; enforcement actions against You or the companies as well partnership associated with You - if any.

Providing some data is a prerequisite for making deposits as well withdrawals. The details regarding to the scope of requirements for particular situation related to Your financial flow is set out in the AML Policy and Customers Due Diligence Procedure [learn more here](#). The consequence of not providing that data is the inability to provide certain Account services and functionalities such as deposit, withdrawal as well other real trading activities required verification of Users.

**Legal basis:** processing is necessary for compliance with a legal obligation (i.e. preventing of money laundering and terrorism financing pursuant EU Directive – 2015/849 – IV Anti - money laundering Directive as well domestic law of Saint Vincent and the Grenadines aiming at prevention of money laundering and terrorism financing and other laws, regulations as well international recommendations) to which SimpleFX is subjected [Article 6 (1c) GDPR] and processing is necessary for reasons of substantial public interest, on the basis of Union ( (i.e. preventing of money laundering and terrorism financing pursuant EU Directive – 2015/849 – IV Anti - money laundering Directive) [Article 9 (2g) GDPR] as well processing is necessary for the purposes of the legitimate interests pursued by SimpleFX i.e. identification of non-verified Users and in specific circumstances their sources of funds to prevent from other frauds or usage of User's stolen data for illicit purposes [Article 6 (1f) of the GDPR].

## **Statistics on the use of particular Website functionalities and facilitating the use of the Services and the mobile application as well as ensuring the IT security of the Services.**

**The scope of data:** For these purposes, we process personal data regarding Your activity on the Website, such as: Your localisation, Your IP, visited websites and subpages of the Sites and the amount of time spent on each of them, as well as data about Your search history, Your IP address, location, device ID and browser data, and operating system.

**Balance of interests.** After assessment Our interests and Your interests, rights and freedoms, We believe that the statistic on the particular Website functionalities and facilitating the use of the Services and the mobile application as well as ensuring the IT security of the Services will not interfere excessively with Your privacy or will not constitute an excessive



burdensomeness for You. In the course of evaluating Your interests, rights and freedoms We have taken into account the following circumstances: We do not process the personal data, that could solely identify You; upgrading the standards of Services provided by Us, resulting in the securing of Users' deposits; avoiding the risk of suspension of the Website due to the illegal activities of dishonest Service Users, causing freezing of funds deposited by reliable Users; regulatory requirements aiming at protection of consumers funds and preventing SimpleFX from malicious actors.

**Legal basis:** Our legitimate interest [Article 6 (1f) of the GDPR], consisting in facilitating the use of services provided electronically and improving the functionality of Our Services.

## **Determination, prosecution of claims and enforcement of claims.**

**The scope of data:** For this purpose, We may process certain personal data provided by You in the Profile, such as: name, surname, date of birth, Your ID, Your place of residence, data on the use of Our Services, if the claims result from the manner in which You use Our Services, other data necessary to prove the existence of claims, including the extent of the damage suffered.

**Balance of interests.** After assessment Our interests and Your interests, rights and freedoms, We believe that the collection the data, specified above will not interfere excessively with Your privacy or will not constitute an excessive burdensomeness for You. In the course of evaluating Your interests, rights and freedoms, We have taken into account the following circumstances: upgrading the standards of services provided by Us, resulting in the better quality of Our Service; avoiding the risk of suspension of the Website due to the illegal activities of dishonest Service Users; preventing SimpleFX from malicious actors.

**Legal basis:** Our legitimate interest (Article 6 (1f) of the GDPR), consisting in determining, prosecution of claims and enforcing claims and defending against claims in proceedings before courts and other state authorities.

**Contact with the Users via any available means of communication provided by Services and examination of Users' complaints and applications.**

**The scope of data:** To this end, We process Your personal data including: email address; user name, location data, , information about the date of sending an email, as well as other personal data provided by You, included in emails and contact forms used to provide You with the satisfaction of using the Website.

**Balance of interests.** After assessment Our interests and Your interests, rights and freedoms, We believe that the collection Your data, as a consequence of contact with Us will not interfere excessively with Your privacy or will not constitute an excessive burdensomeness for You. In the course of evaluating Your interests, rights and freedoms We have taken into account the following circumstances: upgrading the standards of Services provided by Us, resulting in the better quality of Our Service; avoiding the risk of suspension of the Website due to the illegal activities of dishonest Service Users or third parties; preventing SimpleFX from malicious actors.

**Legal basis:** Our legitimate interest (Article 6 (1f) of the GDPR), consisting in improving the functionality of services provided electronically and ensuring satisfaction with Our Services.

## **4. HOW DO WE MATCH THE SERVICES TO YOUR INTEREST AND PREFERENCES?**

Our Website aims to provide the best possible match, the services We provide to Your expectations and preferences. SimpleFX does not use profiling to test Your preferences. However, due to the use of this type of tools for marketing purposes by, among others, suppliers of Your internet browser, websites such as Google Sign-In and Facebook, in order to provide You with the most transparent information below, We describe what profiling is about.

**The scope of data:** To this end, internet service providers (different than SimpleFX) may use Your personal data provided by You when creating an Account, when completing the Profile and data provided in documents saved by You in Your Account, as well as data about Your

activity on the Website, recorded and stored via cookie files and page views that have not been completed by sending a message, the hyperlinks You have clicked, Your username, profile picture, gender, networks and any other information You choose to share when using You on third party websites, platforms and applications (hereinafter referred to as: 'Third Party Sites') (such as when you use the "Like" functionality on Facebook or the Google Sign-In functionality), the websites You visited before arriving at SimpleFX Service, information about the type of browser You use, details of the web pages You have viewed, Your IP address (collectively defined as: 'Site Usage Information').

**Profiling:** Marketing companies (different than SimpleFX) use the above data to create Your profile as a potential recipient of marketing services, corresponding to Your interests and preferences. Then, based on Your profile created in this way, they choose and present to You the best matching ads and messages.

## **Marketing of Our products and services.**

The Policy applies to personal information collected by the SimpleFX in connection with the Services We offer. This includes also information collected offline through Our consumer center, direct marketing campaigns, sweepstakes and competitions, and online through Our Websites, applications and branded pages on third party platforms and applications accessed or used through such websites or third party platforms (collectively defined as: 'SimpleFX Sites').

The Policy also applies to targeted SimpleFX content, including offers and advertisements for SimpleFX products and services, which We (or a service provider acting on our behalf) may send to You on Third Party Sites based on your Site Usage Information. These Third Party Sites may have their own privacy policies and terms and conditions. We encourage You to read them before using those Third Party Sites.

**The scope of data:** For this purpose, We process personal data provided by You when creating the Account, completing the Profile and data about Your activity on the Website, recorded and stored via cookies. Activity data relate in particular to such data as: search history, clicks on the Website, visits to the main pages of the Sites and their subpages, login and registration dates, data on the use of certain services on the Website, history and Your activity related to Our email communication with You; We also receive information that the

affiliate or which marketing campaign (e.g. Google AdWords) has influenced Your interest in the Website.

**Profiling:** Marketing companies (different than SimpleFX) use the above data to create Your profile as a potential recipient of marketing services, corresponding to Your interests and preferences. Then, based on Your profile created in this way, they choose and present to You the best matching ads and messages.

**Remarketing:** In order to reach You with our marketing messages outside of the Services, We use the services of external suppliers or our affiliates. These services consist in displaying our marketing messages on websites other than the Services. For this purpose, external providers install, for example, the appropriate code or pixel to download information about Your activity on the Services. Details can be found in the [Cookies Policy](#).

**Balance of interests:** After assessment Our interest and Your interests, rights and freedoms, We believe that marketing will not interfere excessively with Your privacy and will not be an excessive burdensomeness for You. In the course of assessment interests, rights and freedoms, We have taken into account the following circumstances:

a) as part of the marketing of our clients' products and services, We do not provide Your personal data; in this way We limit the circle of people having access to Your personal data;

b) We ensure that We have implemented appropriate guarantees to protect Your privacy, namely:

i. We only use data about the professional sphere of Your life. We are only interested in what pertains to using Our Service, not Your private life;

ii. We only use data about Your activity on the Website, not what You do on other websites.

Depending on Your location, there may be solutions to help You control Your online behavioural advertising preferences (such as whether certain third parties may collect and use your Site Usage Information for targeted advertising purposes). For example, in Europe the website [www.youronlinechoices.com](http://www.youronlinechoices.com) allows You to choose which companies can deliver

customized ads while in the US You may use the Network Advertising Initiative's Opt-Out Tool and the Digital Advertising Alliance's Opt-Out Tool.

**Legal basis:** Our legitimate interest [(Article 6 (1f) of the GDPR], consisting in the marketing of our products and services.

## 5. TO WHOM DO WE TRANSMIT TO YOUR PERSONAL DATA?

We transmit Your personal data to the following categories of recipients:

**Service providers:** We may process Your personal data to service providers that We use to run the Services. Service providers to whom we transmit Your personal data, depending on contractual arrangements and circumstances, or are subject to Our documented instructions as to the purposes and methods of processing these data (processors) or independently determine the purposes and ways of processing them (controllers). The list of Our main suppliers non-associated with Us, including Our payment processors is constituted as follows:

**Amazon Web Services, Inc.**

P.O. Box 81226. Seattle, WA 98108-1226

**AstroPay LLP, 4 King's Bench Walk, Temple, London EC4Y 7DL UK ,London, United Kingdom.**

**Fasa Centra Solutions Ltd.** 435 Orchard Road 11/F Wisma Atria, Singapore 238877 (owner of brand "FasaPay")

**LiveChat Inc. One International Place** Suite 1400 Boston, MA 02110-2619 United States of America

**Sendgrid, Inc.** Company Address, 1801 California Street Suite 500. Denver, CO 80202

**Zendesk, Inc.** 30 Eastbourne Terrace, Paddington, London W2 6LA, UK

The above list is updated from time to time. Please note, that payment processors required in most of cases only data concerning Your bank account or credit/debit card. In most of situation this data is transmitted primary by You, although in extraordinary case we may ask you for relevant documents required by our payment processors.

**Processing entities:** We use other suppliers who process your personal data based on Our documented instructions. They provide us with a cloud computing service, provide us with online marketing systems, display web push notifications, send e-mail messages, analyze traffic in the Services, analyze the effectiveness of marketing campaigns, and support the implementation of specific Account functionalities; maintain the IT infrastructure of Service and its functionalities; provide customers support services for You.

It's also noteworthy that Your Mobile DeviceID is passed to external provider in order to show on screen notification. With respect to affiliate panel '**unilink**' maintained by external service provider, which is fully anonymized for other users of the panel, our external provider is able to see only Your username, Your device and operating system, browser, location and unique ID; user-generated content, posts and other content You submit to SimpleFX Sites; Your IP; user-generated content.

**Controllers:** We use suppliers who do not act solely on our documented instructions and will set goals and methods of using your personal data. They provide Us with services of marketing, payments processing services, where We are not Controller (e.g. **Paysafe** Financial Services Limited, UK- owner of brand "**Neteller**"; **Skrill** Limited, UK) - remarketing campaigns and provide a license for some IT solutions or IT infrastructure, (e.g. **MetaQuotes Software Corp.** which is licensor of **MetaTrader 4**).

**Location:** Most of Our suppliers are based mainly in the United Kingdom and other countries of the European Economic Area (hereinafter referred to as: 'EEA'), e.g. in Cyprus. Some of Our service providers are based outside the EEA. In connection with the transfer of Your data outside the EEA, We have made sure that Our suppliers guarantee a high level of protection of personal data. These guarantees result in particular from the obligation to use standard contractual clauses adopted by the Commission (EU) or participation in the Privacy Shield program enacted by Commission Implementing Decision (EU) 2016/1250 of 12th July 2016 on the adequacy of protection provided by by the EU-US Privacy Shield.

You have the right to request us to provide copies of standard contractual clauses by addressing the request in the manner indicated in point 2 of this Policy.

**Public Authorities:** We provide your personal data if we are required by authorized state authorities, in particular organizational units of the prosecutor's office and Police - from both

Saint Vincent and the Grenadines and Cyprus, Personal Data Protection Commissioner (Cyprus), the Competition and Consumer Protection Service ('CCPS) together with Ministry of Energy, Commerce Industry and Tourism (Cyprus) or The Office of the Commissioner of Electronic Communications and Postal Regulation (OCECPR') (Cyprus), Financial Service Authority (Saint Vincent and the Grenadines).

## **7. HOW LONG DO WE STORING YOUR PERSONAL DATA?**

We store Your personal data for the period of having an Account on the Website for the purpose of providing the Account service and related functionalities and other services in accordance with the Terms of Use, as well as for marketing purposes. After deleting Your Account, Your details will be anonymised, except for the following data: name, email address and documents provided by You during verification of the User and in certain situations of verification of the funds (We will store this data for a period of 5 years from Account deletion for purposes related to preventing money laundering and terrorism financing and consideration of complaints and claims related to the use of Our Services).

We store personal data of non-logged-in Users for a period of time corresponding to the life cycle of cookies stored on their devices. Details on how We use cookies can be found in the [Cookies Policy](#).

## **8. WHAT ARE YOUR RIGHTS IN RELATION TO PROCESSING YOUR PERSONAL DATA?**

We ensure the implementation of Your rights listed below. You can exercise Your rights by submitting a request on the contact form. Additionally, You can make selected changes to the Account settings in the Settings (Privacy) tab after logging in to the Website.

### **The right to withdraw consent.**

You have the right to withdraw any consent, if the processing of your personal data on the Website is based on Your consent and you provided it at the time of registration to the Website, as well during using individual Services and functionalities offered on the Website - only in event of the Website as well individual services and functionalities offered on the Website providing data processing based on your consent. Withdrawal of consent has effect

since the moment of its withdrawal. The withdrawal of consent shall not affect the lawfulness of processing, performed by Us based on Your consent before its withdrawal.

Withdrawal of consent does not entail any negative consequences for You. However, it may prevent You from continuing to use the Services or functionality that We can lawfully provide only based on Your consent. Except to job application, when the recruitment is carried out, the Website does not process personal data based on Your consent. You will be informed during the collection of personal data in the event of the introduction of our new services involving the personal data processing based on Your consent.

**Legal basis:** Article 7(3) of the GDPR.

## **The right to object to the data being used**

You have the right to object at any time to the use of your personal data, if We process Your data based on our legitimate interest, e.g. in relation to the marketing of Our products and services.

Resignation from further use of the Website expressed in the form of deletion of Account or Your email with adequate content will mean Your object to the processing of Your personal data.

If Your objection turns out to be legitimate and we have no other legal basis to process Your personal data, We will delete Your data which is subject of the objection raised by You.

**Legal basis:** Article 21 of the GDPR.

## **Right to erasure ('right to be forgotten')**

You have the right to request the erasure of all or some of Your personal data. We will treat the request to erasure all Your personal data as a request to delete the Account.

You have the right to request erasure of personal data if:



- a) you withdrew Your specific consent to the extent to which Your personal data were processed based on Your consent;
- b) Your personal data have ceased to be necessary for the purposes for which they were collected or processed;
- c) You raised an objection to the use of Your data for marketing purposes;
- d) You raised an objection to the use of Your data in order to conduct statistics on the use of the Website, and the opposition was considered justified;
- e) Your personal data is processed unlawfully.

Despite the request to erase personal data, in connection with opposition or withdrawal of consent, We may retain certain personal data in the field of preventing money laundering and terrorism financing and to the extent necessary to establish, assert or defend claims. This applies in particular to personal data including: name, surname, email address, documents provided by You during the verification of the User and in specific cases, sources of Your funds, which We retain for purposes of handling complaints and claims related to the use of Our Services.

**Legal basis:** Article 17 of the GDPR.

## **Right to restriction of processing**

You have the right to request a restriction on the processing of Your personal data. If you submit such a request, it will prevent You from using certain functionalities or Services, involving the the personal data processing covered by the request. You will also not receive any messages, including marketing messages.

You have the right to request restrictions on the use of Your personal data in the following cases:

a) when You contest the accuracy of Your personal data - then We will restrict their use for the time needed to verify the accuracy of Your data, but no longer than for 7 days since the receipt of Your request;

b) if the processing of Your data is unlawfully, and instead of erasure Your personal data, You will demand restriction of their use;

c) where Your personal information has ceased to be necessary for the purposes for which We have collected or used it, but it is necessary for You to determine, assert or defend claims;

d) if You object to the use of Your data - then the restriction occurs for the time needed to consider whether, due to Your special situation, protection of Your interests, rights and freedoms override the interests based on which We process when We process Your personal data.

**Legal basis:** Article 18 of the GDPR.

## **Right of access to the data.**

You have the right to obtain confirmation from Us whether We process your personal data, and if this is the case, You have the right to:

a) get access to Your personal data;

b) obtain information about the purposes of processing, categories of personal data being processed, the recipients or categories of recipients of this data, the planned period of storage of Your data or criteria for determining this period, information concerning your rights under the GDPR and the right to file a complaint to the supervisory authority, the source of these data, on automated decision-making, including profiling and safeguards applied in connection with the transfer of these data outside the European Union;

c) obtain a copy of Your personal data.

**Legal basis:** Article 15 of the GDPR.

## **The right to rectify Your personal data**

You have the right to rectify and supplement Your personal data. You can do it yourself in the Settings (Privacy) tab. With regard to other personal data, You have the right to request us to correct this data (if it is incorrect) and to supplement it (if it is incomplete).

**Legal basis:** Article 16 of the GDPR.

## **The right to data portability.**

You have the right to receive Your personal information that You provided to Us and then send it to another personal data controller chosen by You, e.g. to another controller of similar services. You also have the right to request that personal data be sent by Us directly to such other controller, if it is technically possible.

We will send your personal data in the form of a csv file. The csv format is a commonly used, machine-readable format that allows you to send the received data to another controller of personal data.

**Legal basis:** Article 20 of the GDPR.

## **When do we meet your request?**

While - by exercising the aforementioned rights - You request Us, We comply with this request or refuse to comply with it without delay, but no later than one month after receipt. However, if - due to the complexity of the request or the number of requests - we will not be able to meet your request within a month, we will meet them within the next two months, informing you in advance about the intended extension.

For technical reasons, we always need 72 hours to update the settings you have selected in our systems. Therefore, it may happen that you will receive an email from us during the system update, from which you have given up.

## **Filing complaints, inquiries and applications**

You can make complaints, requests and applications to Us regarding the processing of Your personal data and the exercise of Your rights.

If you believe that Your right to the protection of personal data or other rights granted to you by virtue of the GDPR have been violated, you have the right to fill a complaint against Us to the Personal Data Protection Commissioner of Cyprus.

## **9. HOW DO WE LOOK AFTER THE SAFETY OF YOUR PERSONAL DATA?**

We strive to ensure the security of Your personal data. The Services use encrypted data transmission (SSL) during registration and logging in, which protects the data identifying You and significantly hinders the interception of access to Your account by unauthorized systems or persons

## **10. HOW DO WE USE COOKIES?**

Details on how we use cookies can be found in [Cookies Policy](#).

## **11. AMENDMENTS IN THE PRIVACY POLICY**

Depending on Our needs, We may change and supplement the Privacy Policy. We will inform You about any changes or additions by posting relevant information on the main pages of the Services, and in case of significant changes, We can also send You separate notifications to the email address provided by You.