

## PRIVACY POLICY

### 1. Introduction

The Privacy Policy of the A-Conversio Capital LTD applies to existing and potential clients as well as to any person visiting any website operated by the Company. A-Conversio Capital LTD is responsible to protect the privacy of all personal data that acquires, and to manage the protection of privacy and the safekeeping of clients 'personal and financial information. A-Conversio Capital LTD has taken measurable steps to protect the confidentiality, security, and integrity of your Information.

As per the relevant sections of the Law 2016/679, If you are a natural person, A-Conversio Capital Ltd, is the personal data processor and controller of your personal data in relation to the processing activities which your personal data undergo as stated further below.

For the purposes of this statement:

- a) Personal Data shall mean your personal information including:
- Personal details (i.e. name, address, contact number and email address)
  - Financial information (i.e. estimate annual income, net worth, investment trading experience and investment knowledge);
  - Identity verification documents (i.e. passport, ID, utility bill, bank statement, and incorporation documents for legal entities including all kinds of certificates)
- b) Controller shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law;
- c) Processor shall mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

### 2. Scope

The purpose of this Privacy policy is to provide you an overview of how the Company collects and processes your personal data and informs you about your rights under the data protection law and the General Data Protection Regulation ("GDPR"). The notice is addressed to individuals who are the Company's current or potential clients.

In addition, this notice gives you information on the circumstances under which the Company may share your personal information with any third party related to the Company.

### 3. Collection of Personal Data

The company in order to carry out its services and activities, will collect and maintain the necessary personal information for at least five (5) years. It is the Company's obligation to create a client's profile in order to provide its services efficiently based on the client's

requirements and preferences. The Company will therefore collect and hold clients' personal data when a client completes the online application for opening a demo or a live account or when participating in any other promotion and/or offers through websites operated by the Company. Clients not wishing to provide such Personal Data will not be able to open an account with the Company or be provided with other products and/or services of the Company. Clients have a responsibility to ensure that the Personal Data they provide to the Company are accurate.

The Company also lawfully collects and processes Personal Data from publicly available sources (including, inter alia, credit reference agencies, fraud prevention agencies banks and other financial institutions) in order to meet its regulatory obligations and for confirming the validity of the provided information

The Company may also collect your Information about your use of our website(s), such as visited websites, frequency, duration of visits and trading activities. The Company also keeps records of your trading activity

The Company under applicable laws and regulations is required to keep records containing Client Personal Data, trading information, account opening documents, communications and anything else which relates to the Client after the execution of each transaction and/or for six (6) years of the termination of the business relationship.

#### **4. Disclosure of personal information**

As part of using your personal information for the purposes mentioned above, we may disclose your information to:

- a) third party payment service providers who help the Company provide its Clients the services of securely deposit and withdrawal to and from a Client's account;
- b) other service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support;
- c) governmental and regulatory bodies, including law enforcement authorities and CySEC, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Company to comply with its legal and regulatory requirements;
- d) credit reference and fraud prevention agencies, third party authentication service providers and other financial institutions for the purposes of credit checking, fraud prevention and anti-money laundering controls;
- e) external consultants including legal and tax consultants;
- f) data reporting service providers;
- g) market research companies and call centers;
- h) affiliates of the Company; and
- i) tied agents of the Company.

The Company requires from organisations outside the Company who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy policy.

## 5. Use of Information

The Company will use, store, process and handle Your Personal Data in accordance with the General Data Protection Regulation 2016/679 and the Processing of Personal Data (Protection of the Individual) Law of 2001, as amended or replaced from time to time.

Your personal data will be collected and processed explicitly and specifically for:

- Verification of your identity;
- Creation and maintenance of your personal file;
- Transmit and execute your orders;
- Assess your suitability to the products and services provided by the Company;
- The provision of post transaction related services;
- Inform you of the Company's products and services;
- Assess and improve your browsing experience;

We may transfer your personal information outside the European Economic Area ("EEA"). If we initiate such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by applicable laws and regulations. The Company follows the EU and members states laws in respect to this matter and it shall ensure that the third country that your data may be transferred is recognised as equivalent to the protection of your personal data as an EU member state.

## 6. Your Consent

The use of your personal information is based on lawful basis:

- a) to perform our contractual obligations towards you
- b) to be compliant with the legal and regulatory requirements
- c) to pursue our legitimate interests

In accordance to the abovementioned points we are legally obliged to do process your personal data. Where our use of your personal information does not fall under one of these three Lawful basis we require your consent. Such consent will be provided in accordance with the Client Agreement that it is provided to you during the account opening procedure and is also available on the Company's website(s). The Company shall rely on the provided consent as its legal basis for processing your personal data. You have the right at any time to withdraw that consent by contacting us via phone or via email at.

Where you are a natural person and the use of your personal data requires your consent, the Company will request for your consent to be provided freely, specific, informed and an unambiguous indication of your desires, which by statement or by clear affirmative action, signifies agreement to the processing.

If at any case you feel compelled to consent or you will endure negative consequences if you do not, then your consent will not be valid. Additionally, your consent shall not be bundled-up as a non-negotiable part of terms and conditions, because such action would indicate that you haven't freely provided your consent.

## 7. Processing your personal data without your consent

In certain circumstances the company can process your data without your consent. The following are considered to be the most relevant:

- Processing is necessary for compliance with our legal obligations
- Processing is necessary for the performance of a contract to which the person is party, or in order to take measures of the person's request prior entering into a contract.
- Processing is necessary in order to protect the vital interests of your personal data.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of public authority or a third party to whom the data are communicated.
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by the third party to whom the personal data are communicated, on condition that such interests override the rights, interests and fundamental freedoms of the persons.

## 8. Your Rights

**Right of access:** you have the right to be informed whether the Company is processing your Personal Data, and to provide you with a copy of that Personal Data upon request.

**Right to rectification:** you are entitled to request that the Company corrects or completes your Personal Data if it is inaccurate or incomplete.

**Right to erasure:** you can ask the Company to erase or remove your Personal Data under certain circumstances.

**Right to restrict processing:** You can ask the Company to restrict the processing of your Personal Data

**Right to data portability:** you have the right to obtain your Personal Data provided to the Company in a structured, commonly used and machine-readable format.

**Right to object:** you may ask the Company at any time to stop processing your Personal Data

**Rights in relation to automated decision-making and profiling:** you have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, that affect you, unless such profiling is necessary for entering into, or the performance of, a contract between you and the Company or you provide explicit consent.

**Right to withdraw consent:** If the Company relies on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of the processing that took place on the basis of your prior consent.

**Right to lodge a complaint with the data protection authority:** If you have a concern about the Company's privacy practices, including the way in which the Company handled

your Personal Data, you can report it to the Office of the Commissioner for Personal Data Protection.

## 9. Safeguard Measures

The Company has taken all the appropriate organisational measures to ensure that your personal data are secured. Moreover, the Company has established an Internal Educational Training for its employees so as to mitigate any risks that may affect your data. Employees who process your data are trained to respect client's information confidentiality and individual privacy. We consider breaches of your privacy as top priority and the Company will enhance its internal procedures to prevent any such event.

The Company has implemented procedures in respect to safeguarding your data. Access to your information is permitted only to employees of the Company that need to have access to the information in order to enable the continuity of the agreement between you and the Company.

Furthermore, we hold personal information in a combination of secure computer storage, secure servers and from time to time and if it is deemed necessary we will store them in paper-based files. The Company has taken all the necessary steps to protect the personal information that it holds from misuse, loss, unauthorised access, modification or disclosure.

While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

## 10. Change of Information

You may inform the Company at any time that your information has changed or that you wish to delete information we hold about you by emailing us at [dataprotection@a-conversio.com](mailto:dataprotection@a-conversio.com). We will change or delete your information in accordance to your instructions, except to the extent that we are required to hold your information for regulatory or legal purposes.

## 11. Queries

If you have any queries regarding this Privacy policy, or you wish to access or change your information or have a complaint, or if you have any questions about security on any of our websites, you may email us at [dataprotection@a-conversio.com](mailto:dataprotection@a-conversio.com).

## 12. Updates

This Notice is subject to change without notice, so we recommend, that you look for updates on a frequent basis.