

# **Privacy Policy**

This Privacy Notice describes how Finteria Limited processes your personal data under the <u>General Data Protection Regulation</u> (GDPR). The terms used in this Privacy Notice have the same meaning as defined in the GDPR and in the Client Agreement. This Privacy Policy is an integral part of the Client Agreement.

## 1. Contact details of the Controller and the Data Protection Officer

#### Our contact details as of the Controller:

Name: Finteria Limited

Website: www.finteria.pro

E-mail: info@finteria.pro

#### **Contact details of our Data Protection Officer:**

E-mail: <a href="mailto:dpo@finteria.pro">dpo@finteria.pro</a>

## 2. The categories of personal data we collect

We currently collect and process the following categories of personal data:

- Identification data such as first and last name, client ID number;
- Contact data such as e-mail address, phone number;
- Account data such as account number, wallet address;
- Financial data such as transactions, payment card number.

## 3. How we get the personal data and why we have it

3.1. We process your personal data for the following reasons:

- To check and verify your identity;
- To open, register, administer and maintain your Trading Account with us;
- To conclude, amend, maintain and terminate the Client Agreement;
- To withdraw funds from your Trading Account;
- To manage relationship with you, as well as to authorise, provide, control and administer access to our Services;
- To prevent, discover, investigate and report potential money laundering and/or terrorist financing cases;
- To prevent, limit and investigate any misuse or unlawful use or disturbance of our Services;
- To manage risks;



- To ensure adequate provision of our Services and the safety of information within our Services, as well as to improve, develop and maintain our Website, IT infrastructure, including testing our digital environment;
- To provide you additional Services and inform you about new or better Services, as well as to strengthen our brand, improve our Services, perform surveys, analyses and statistics;
- To establish, exercise, or defend legal claims, handle complaints, as well as to retain personal data for this purpose.
- 3.2. Under the <u>General Data Protection Regulation</u>, the lawful bases we rely on for the processing your personal data:
- Your consent.
- We have a contractual obligation.
- We have a legal obligation.
- We have a legitimate interest.
- 3.3. Personal data we process is provided to us directly by you.
- 3.4. We do not sell your personal data to any third party. We may share your personal data in relation to the normal operation of our business with the following categories of recipients:
- Third party software providers;
- Financial or other supervisory authorities.
- 3.5. If we transfer your personal data outside the European Union / European Economic Area, we ensure the fulfilment of one of the following conditions:
- Personal data is transferred to the third country which provides an adequate level of data protection as decided by the European Commission;
- We or the company processing personal data on our behalf (processor) provide appropriate safeguards, for example, standard data protection clauses or other authorised contractual clauses, approved codes of conduct or certification mechanisms;
- There are derogations for specific situations, for example, performance of a contract with you; conclusion or performance of a contract concluded in your interests; establishment, exercise or defence of legal claims.

#### 4. How we store your personal data

- 4.1. Your personal data is securely stored in the computer-based storage facilities or the physical archive. We have implemented appropriate technical and organisational measures to safeguard your personal data from unauthorized access, unlawful disclosure, accidental loss, modification, destruction or any other unlawful processing of data. All our staff is trained to ensure security and confidentiality in handling your personal data.
- 4.2. We keep your personal data for no longer than is necessary for the purposes for which your personal data is collected and otherwise processed. For example, we keep your personal data as long as we have a contractual relationship with you. After the end of the contractual relationship, we will keep your data for a maximum period of limitation according to the applicable laws for the establishment, exercise, or defence of legal claims. After the end of the retention period, we will then



securely dispose your personal data by deleting the data kept in a digital format or destroying paper documents.

## 5. Your data protection rights

5.1. Under the General Data Protection Regulation, you have rights including:

Your right of access - You have the right to ask us for copies of your personal data.

**Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete the personal data you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal data when the processing is based on our legitimate interests. You have an unconditional right to object to processing (opt-out) for direct marketing purposes.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw the consent** – You have the right to withdraw your consent for the processing of your personal data.

- 5.2. You are not required to pay any fee for exercising your data protection rights. Please contact us at <u>dsr@finteria.pro</u> if you wish to make a request. If you make a request, we have one month to respond to you.
- 5.3. If you have any concerns about our use of your personal data, you can make a complaint to us at <a href="mailto:dsr@finteria.pro">dsr@finteria.pro</a>. You can also complain to the data protection supervisory authority in the Member State of your habitual residence, place of work or place of alleged infringement if you are unhappy with how we have used your personal data. Contact details of the competent supervisory authorities are available <a href="mailto:here">here</a>.

#### 6. Cookies

- 6.1. We use cookies at our website <u>www.finteria.pro</u>. Cookies are small text files that are placed on your computer or other devices (for example, smartphone, tablet) when you visit our Website.
- 6.2. We use the following types of cookie as your browse via our Website:
- Necessary cookies. These cookies are placed by default to enable core functionality of our website, such as security, network management, and accessibility. They are also set in response to your request for services, such as setting your language preferences, logging on our Website. No consent is needed for placing these cookies. However, you may disable the necessary cookies by changing your browser settings, but this may affect how the website functions.



- Third-party Analytical cookies. We would like to set Google Analytics cookies to help us to improve our Website by collecting and reporting information on how you use it. These cookies collect information in a way that does not directly identify anyone. These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and see how users move around our website. Before they are placed on your computer or other devices, you will be shown a cookies permission banner seeking your consent to the use of these cookies. By clicking "I agree", you enable us to place and store these cookies on your computer or other device.
- 6.3. You may, if you wish, withdraw consent to the placing of cookies or disable future cookies; however, you may not be able to access certain areas or features of our website. If you wish to withdraw your consent to the use of cookies, you shall delete the cookies stored on your computer or other devices through the settings and configurations of your Internet browser. Find out how to manage cookies on popular browsers:
  - Google Chrome
  - Microsoft Edge
  - Mozilla Firefox
  - Microsoft Internet Explorer
  - Opera
  - Apple Safari.

To find information relating to other browsers, please visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, please visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>.

6.4. Our website contains links to external websites. It is important to note that these pages are not governed by our Privacy Policy. Therefore, once you chose to leave our Website, we do not have any control over these external websites. We cannot access the data stored in the cookies of other websites when browsing the mentioned websites. As a result, we cannot be responsible for the protection of any personal data you provide once on another website.

## 7. Validity and changes to the Privacy Policy

We keep our Privacy Policy under regular review to make sure it is up to date and accurate. For this reason, we have reserved the right to unilaterally amend this Privacy Policy at any time, without prior notice. The latest version of the Privacy Policy is available on our website <a href="www.finteria.pro">www.finteria.pro</a>. Please check our website regularly for any changes to this Policy.