

eurocapital

PRIVACY POLICY

OCTOBER 2021

Eurocapital is committed to protecting customers' privacy. This Privacy Policy describes what Personal Data we collect, use and process and how this information is used in the course of our business.

1. Customer data

The Company collects customer data for various reasons, which include:

- a. The provision of investment and ancillary services,
- b. To ensure compliance with the provisions of the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007-2019,
- c. To communicate with customers,
- d. For marketing purposes,
- e. To defend its legal rights,
- f. For recruitment, employment and payroll, and
- g. For any other purpose similar or connected to the above or for any other purpose that the customer will provide personal data to us.

Customer's data include name, address, identification details, postal and business address, mobile phone number, email, profession, bank account details, social insurance number, tax identification number, certificate of clean-criminal record, certificate of non-bankruptcy and other relevant details. This data is stored and processed by the Company throughout the validity period of the contract / relationship, in order to provide the requested services, handle requests and/or enquiries and perform payments. This data is also stored for a period of five years after the termination of the contract / relationship.

2. Processing activity name

The Company may process the personal data set out above for any of the following purposes:

We use personal information to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

We may use your information for the following purposes:

- Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners' products and services. This communication is subscription based and requires your consent.
- Send you information about the products and services that you have purchased from us.
- Perform direct sales activities in cases where legitimate and mutual interest is established.
- Provide you content and venue details on a webinar or event you signed up for.
- Reply to a 'Contact me' or other web forms you have completed on one of our websites (e.g. to download a whitepaper).
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Provide you with access and services related to a Free Trial of our applications.
- Provide access to our Customer Support portal or the website.
- Perform legal and contractual obligations such as order confirmation, license details, invoice, reminders, and similar.
- Notify you about any disruptions to our services (system messages).
- Contact you to conduct surveys about your opinion on our products and services.

The Company takes all necessary steps to safeguard the Confidentiality, Integrity and Availability of its systems and services, e.g. to protect against cybersecurity threats, fraud, etc. Personal data is stored by the Company for a period of five years after the termination of the contract / relationship. After the lapse of this period this data is erased.

The following data is not erased:

- a. Data processed for the purposes of legitimate interest (e.g. an action against a customer), which are maintained until the legitimate purpose is completed.

3. Marketing

We may use your data to provide you with information about our goods and services which may be of interest to you and we or our agents may contact you about these by post and telephone.

If you are an existing customer, we will only contact you by electronic means (such as email, voicemail or SMS) with information about our goods and services similar to those which were the subject of a previous sale to you.

If you do not want us to use your data in this way, please tick the relevant boxes when we collect your marketing preferences. You may change your preferences at any time by contacting a Client Services representative. An opt out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold with us.

4. General customers' rights according to european regulation 2016/679 ("gdpr")

4.1 Right of access

Customers may be informed in more detail about the Personal Data processes of the Company by:

- a. Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b. Requesting via email at support@euro.capital the relevant application form and submitting the said via the same email address.

The right of access is subject to the provisions of the Cyprus data protection legislation and the authentication of the legal subscriber.

4.2 Right to erasure ("right to be forgotten")

Customers may request the erasure of any of their Personal Data by:

- a. Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b. Requesting via email at support@euro.capital the relevant application form and submitting the said via the same email address.

The right to erasure is subject to the provisions of the Cyprus data protection legislation and the authentication of the legal subscriber.

4.3 Data portability

Customers may exercise the right to data portability by:

- a. Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b. Requesting via email at support@euro.capital the relevant application form and submitting the said via the same email address.

Data portability is subject to the provisions of the Cyprus data protection legislation and the authentication of the legal subscriber.

4.4 Right of updating, rectification or minimization of personal data

Customers may update their Personal Data or request the correction of any inaccurate Personal Data or data minimization, by:

- a. Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b. Requesting via email at support@euro.capital the relevant application form and submitting the said via the same email address.

These rights are subject to the provisions of the Cyprus data protection legislation and the authentication of the legal subscriber.

5. Information security measures

The Company maintains solid information security measures and procedures to safeguard customers' Personal Data, in line with our legal obligations.

A comprehensive approach is considered for information security to effectively ensure the Confidentiality, Integrity and Availability of customers' Personal Data. The Company endeavors to implement a holistic Information Security Management System to effectively safeguard the Confidentiality, Integrity and Availability of our Customers data.

6. Transfers outside the eu (european union) and/or the eea (european economic area)

Customers are informed that the associates of the Company are based within the EU and/or the EEA. These partners are contractually committed to the Company to provide appropriate security safeguards and to maintain the confidentiality of the customers' Personal Data.

7. The company's contact information/complaints

Customers can contact the Company for any information on its Privacy Policy by phone at +357 25 262 826, or by post at 35 Bragadinou, 2nd Floor, 3040 Limassol, Cyprus or by email at support@euro.capital. The same contact details may be used for any inquiry or complaint.

8. Definitions

- 8.1** "Controller": means 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, the controller or the specific criteria for its nomination may be provided for by Union or Member State Law.
- 8.2** "Personal Data": means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 8.3** "Processing": means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 8.4** "Processor": means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.