

PRIVACY POLICY

This is the Privacy Policy of A. ETERNITY CAPITAL MANAGEMENT LIMITED (the “Policy”), a Cypriot Investment Firm established in accordance with the laws of the Republic of Cyprus under registration number HE368071 having its registered office at 73 Archbishop Makarios Avenue III, Methonis Tower, Office 301, Suite 2, 1070 Nicosia, Cyprus, which is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) with license number 346/17. This Privacy Policy sets out how A. ETERNITY CAPITAL MANAGEMENT LIMITED (hereinafter called “Company” “we” “our” or “us”) processes personal data, whether on individuals, visitors of our website, a prospective client or a client of ours or otherwise.

PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Article 5 of GDPR sets out seven key principles related to the processing of personal data, which controllers (responsible for the control of your personal data) need to be aware of and comply with when collecting and otherwise processing personal data:

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. Collected for specified, explicit and legitimate purposes, which are determined at the time of the collection of the personal data, and not be further processed in a manner that is incompatible with those purposes.
3. Adequate, relevant, and limited to what is necessary for the purposes for which they are processed.
4. Accurate and, where necessary, kept up to date, taking every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay.
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Such personal data may be stored for longer periods insofar as the personal data will be processed solely for achieving purposes required by the GDPR Regulation to safeguard the rights and freedoms of the data subject.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
7. The controller shall be responsible for and be able to demonstrate compliance with the rest of the principles mentioned above.

Collection of personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. Any personal data that is collected by the Company through the provision of the Services shall be processed according to the Processing of Personal Data (Protection of Individuals) Law 2001 (the “Personal Data Law”), as amended or replaced from time to time, and according to the General Data Protection Regulation (EU) 2016/679 (the “GDPR”).

Personal Data may include:

- Application information: Full name, address, birth date, identity card, tax registration number, occupation, income, email address.
- Transaction Information: Client’s trading account balances and trading activity.
- Verification Information: Identity card, passport, utility bill, bank statement; all requirements on verification information derive from applicable legislation required to collect information and act, where necessary, to verify a client’s identity.
- On-going Information: Information provided in the course of the provision of our services (for example, information on professional relationships and background, financial wealth and assets held, transactions entered into, tax status)

As we are obliged to regularly review our Clients’ accounts from time to time, we may also ask you to provide us with updated personal and financial information.

For legal entities, we will request to be provided with personal information and documentation for the identification and verification of the identity of the Officers, Shareholders and the natural person who ultimately owns or controls the legal entity.

In case of a failure to provide the required personal information, may have as a result the failure of the establishment of a business relationship with our Company.

STORAGE OF PERSONAL DATA

We protect your personal data in a manner that ensures appropriate security and confidentiality, including the prevention of unauthorised access to or use of personal data. We have also established appropriate organizational and technical measures for ensuring the security of processing of the personal data maintained by us.

We undertake steps to ensure that the information collected is stored according to the requirements of the applicable laws.

Our employees have access to personal data only and to the extent required to fulfil their duties.

All electronic communication between the Company and the client, that result or may result in transactions or client order services, is being recorded.

We will keep your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of complying with any legal, or reporting obligation.

SHARING YOUR PERSONAL DATA

We treat your personal data with respect and confidentiality and do not share it with third parties except as described below:

- Third parties, service providers and external advisors we collaborate with for electronic identity verification purposes, services which are required for the provision of our services, provision of guidance and advice on matters related to our business in order to comply with all our regulatory obligations.
- Credit institutions that are processing transactions.
- Courts, governmental bodies and regulatory authorities as required to comply with the law and our regulatory obligations.
- Where it is necessary to transfer data to anywhere outside of the EU or outside the EEA, we will comply with any transfer requirements applicable under GDPR and national legislation.
- Anyone who is authorized by you.

The disclosure of personal data will only be made to the extent necessary to comply with our contractual obligations, the obligations imposed on us by any applicable law and regulation and/or as required to perform their contractual obligations towards us. The third parties we engage are not allowed to use or share your personal data for a purpose other than to provide services to us.

YOUR RIGHTS TO YOUR PERSONAL DATA

You have certain rights under the GDPR. These are:

Right of access to your personal data: Upon relevant request, you will be informed if your personal data is processed, what data, as well as information about processing purposes.

Right to object: You have the right to object at any time the processing of your personal data, for grounded and legitimate reasons.

Right to rectification: You have the right to obtain the rectification of inaccurate personal data. Considering the purpose of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right of erasure: You have the right to request the deletion of your personal data where the personal data are no longer necessary in relation to the purpose for which they were collected, there is no other legal ground for the processing, the personal data must be erased for compliance reasons. This right may not be applied to the extent

that processing is necessary for reasons of public interest, for compliance with any legal obligation and for the establishment, exercise or defence of legal claims.

Right to restriction of processing: You have the right to obtain restriction of processing where the accuracy of the personal data is contested by the data subject or the processing is unlawful or the personal data are no longer needed for the purposes of the processing.

Right to withdraw: You have the right to withdraw your consent at any time. Such withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.