



Privacy Policy

May 2022

1. Introduction

This Privacy Policy describes how Conotoxia Ltd (“The Company”) collects and uses information through its approved domains and any other related sites and applications. This Privacy Policy does not apply to websites operated by other organisations and other third parties.

Conotoxia Ltd is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus; therefore, any clients’ personal data is kept by the Company according to the 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) (hereinafter referred to as “the GDPR”) which has been in force since 24/05/2016 and is applied as of 24/05/2018, as per Article 99(2) thereof.

2. Company Commitment

The Company respects the privacy of any user that accesses its websites and understand the importance of maintaining the confidentiality and privacy of users information, therefore, we are committed in taking all reasonable steps in safeguarding any existing or prospective clients, applicants and visitors. The Company’s commitment is to protect the personal data as well as the privacy of its client therefore, the following polis has been prepared in order to provide clear explanation of the way the Company treats the information provided by the clients or prospective clients and the data which has been collected by the Company.

3. Data collection

In order to open an account with the Company, you must first complete and send an application form with certain information that we will require from you in order to do so. By completing the application form you are requested to disclose private information in order to enable us to evaluate your application and comply with relevant rules and regulations. This information may also be used by the Company to inform you regarding its services.

By private information, we refer to data that may be used to identify you as a person. Personal data include your name, your address, your telephone number, your e-mail address, your age, your gender, a part of your credit card number or IBAN information for the bank payments, your login details, financial background, prior trading experience in order to perform appropriateness test, source of funds (this information is collected in order to accept your deposits in accordance to AML legislation), your jurisdiction of residence, tax identification number (for the purpose of the CRS Decrees we are required to collect your account balance/value as of the end of the calendar year, Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.

Moreover, information about you may also be collected by any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website,

subscribe to our service or any other activities carried out on our website or any connected applications. We may also collect your information in regard to your use of our websites, such as pages visited, frequency, IP address, duration of visit and trading activities.

For the purposes of the Decree issued by the Minister of Finance of Cyprus for the implementation of the Multilateral Agreement on the Automatic Exchange of Financial Account Information signed by the Cyprus Government on October 29, 2014, on the basis of the Common Reporting Standard developed by the OECD (the "CRS Decree"), the Administrative Cooperation in the Field of Taxation (Amending) Law of 2016 (ACFT Law) and the General Data Protection Regulation (EU) 2016/679 (GDPR), the Company will act as data controller and will be responsible for processing of the personal data.

4. Use of the data collected

The Company will use, store, process and handle Your personal data (in case you are a natural person) in connection with the furthering of the Agreement between us, in accordance to the Processing of Personal Data (Protection of the Individual) Law of 2001.

Data provided by You which we hold is to be treated by us as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of our services to you.

The personal information that you provide in connection with registering yourself as a user of our websites or of the services can be used only in relation of the furthering of our Agreement between us, establishing and managing your account or a relationship between us, reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or opportunities that we believe may be relevant to you, improving our relationship, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes (according to the Agreement between us), as applicable.

If you have an account with us, we may process your personal data for the purpose of direct marketing regarding the Services provided. Processing for this purpose includes measuring or understanding the effectiveness of our marketing activities and matching content or marketing activities - profiling (automated assessment based on the personal data we have about you). The legal basis for such processing is our legitimate interest. It consists of promoting the Services provided as part of the Company's business. Regardless of this, the provision of marketing content to you via electronic channels or by telephone requires your prior consent to these contact channels. You can deactivate the previously selected consent for a marketing content transmission at any time by changing your settings on Portal by yourself or if you require any assistance, you can contact our Customer Care Department. When we send you a letter, regarding your use of the services available on the Portal, we may include marketing content in it, especially about currently offered services, or products. Such activity does not require your consent. The legal basis for processing your personal data for this purpose is our legitimate interest in marketing the Services provided as part of the portal and our business.

5. Data processing for AML/CFT purposes

The processing of personal data for any other purposes, such as commercial purposes, is prohibited. The Company shall provide new customers prior to the commencement of a relationship or the processing of an occasional transaction information on the processing to which the personal data is subject pursuant to the provision of the law for purposes of prevention of money laundering.

For the purposes of the AML/CFT Law, personal data shall be processed by the Company solely for the purposes of the said Law and shall not be processed in any other incompatible manner.

If the purpose for which the Company processes data does not or no longer requires the identification of the data subject by the Company, the Company shall not be obliged to maintain, acquire or process additional information in order to identify the data subject for the sole purpose of complying with the Data Protection Regulation.

However, it should be noted that the Company is obliged by the AML Law to keep the records of the below data for a period of five years after the end of the business relationship with a client or after the date of an occasional transaction:

- Copies of documents and information required for compliance with the customer due diligence requirements as determined in the present Law
- relevant evidence and records of transactions which are necessary for the identification of transactions
- relevant correspondence documents with customers and other persons with whom a business relationship is maintained.

The subject's right of access personal data relating to him or her may be partially or completely waived to, in accordance with the provisions of the Personal Data Processing (Protection of Person) Act:

- in order to enable the Obligated Entity or competent national authority to fulfil its tasks properly for the purposes of the AML/CFT Law; or
- not to impede the conduct of official or legal investigations, analyses or procedures for the purposes of the AML/CFT Law and to ensure that the prevention, investigation and detection of ML and TF is not jeopardized.

Therefore, by accepting this policy you acknowledge you have been informed of the legal obligations of the Company under the AML/CFT Law to process data for the purposes of the prevention of ML and TF.

6. Cookies

The Company's website uses cookies and other similar technologies which may collect tracking data to distinguish you from other users. This allows us to provide you with exceptional experience when accessing the Company's website and use its services.

Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer. This allows the server to deliver a page tailored to a particular user.

The Company uses the following types of cookies on its website:

Cookie ID	Information Collected
Remit_Calculator_en Remit_Calculator_pl Calculator Currency Calculator Currency _pk_ses.1.ec2f _pk_ref.1.ec2f _pk_id.1.ec2f _hjIncludedInSample _gid _ga _ga_gat_UA-5538840-10	<p>Saved currencies and values from the calculator to "/ money transfers" for EN</p> <p>Saved currencies and values from the calculator to "/ money transfers" for PL</p> <p>Saved currencies and values from the calculator for "/ exchange-currencies" and "/ exchange-currencies / currency-calculator" for PL</p> <p>Saved currencies and values from the calculator to "/ exchange-currency" and "/ exchange-currency / currency-converter" for EN</p> <p>Analytics - visitor behaviour and measuring page performance</p> <p>Analytics - visitor behaviour and measuring page performance</p> <p>Analytics - visitor behaviour and measuring page performance</p> <p>Hot Jar analytics - identifying the user and analysing his behaviour</p> <p>Google analytics - information on every page viewed</p> <p>Google analytics - gives the user a unique ID and collects data on visitor requests, sessions, etc.</p> <p>Google analytics - gives the user a unique ID and collects data on visitor requests, sessions, etc.</p>

When you use the services provided by us, we may also gather information such as technical data about the devices you use to access them, including your internet connection, IP address, or other technical details provided by your browser. In addition, we process specific information about your use of our services, such as measurement data about when and how you use the services, traffic data, your transaction history list and the type of transactions you make. We collect data using cookies or similar technology.

For more information, please refer to our Cookies Policy, which is an integral part of this Privacy Policy and can be located at the bottom of our website.

If you consent to receive commercial information by email, you will receive marketing content messages from us. In order to measure or understand the effectiveness of our marketing activities and to match the content or marketing activities, we monitor these emails using the pixel tag or links contained in the message body. Pixel tags are a graphic element of the pixel size. With its help, we collect information primarily about whether the message was opened and when. In addition, we can also receive your IP address (which allows us to determine your approximate location) or data about your device, such as information about the web browser, type and version of the operating system. You can express or revoke your consent to our use of the pixel tag through the settings in your email program or service as indicated

by its provider. Information on changing the pixel tag settings in selected email programs or services is available on the following pages:

- Gmail
- Apple Mail
- Microsoft Outlook

If you click on a link in the email, we will know that you have visited the linked website and when this visit took place. If you do not want to be monitored in this way, you can unsubscribe from receiving marketing information by email at any time by changing your account settings yourself on your Portal or if you require any assistance you can contact our Customer Care Department.

7. Choice/Opt-out

We may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or pop-up.

If you no longer wish to receive any communication from the Company, you may opt-out of by following the relevant instructions included in each communication sent to you. Company reserves the right to contact you, albeit the fact that you have opted out, in cases where The Company deems such contact as necessary.

In accordance to the opt-out right you may exercise the following rights:

- You may request at any time copies of all your personal information that the Company holds
- You may ask to update and correct any out of date personal information
- You may request to delete your personal information that the Company holds

In case you wish to erasure any of your personal information, the Company may:

- Retain some of your personal information for legitimate business interests, such as fraud detection and prevention or enhancing safety
- Retain and use your personal information to comply with the legal obligations (the Company is legally obliged to keep all and any information which is necessary to fulfill the Company's obligations under the applicable laws for a period of at least five years after the end of the business relationship)

8. Security and protection of your data

The personal information that you provide in connection with registering yourself as a user of the portal or of the services is classified as 'Personal Information'. 'Personal Information' is protected in many ways. You can access your 'Personal Information' through a username and password selected by you. It is your responsibility to ensure that your password is encrypted and known only to you. Your password must not be revealed to anyone.

Personal Information is safely stored on secure servers that only authorised personnel have access to via a username and password. The Company protect the information that holds, in particular:

- we hold personal information in secure facilities and where the information is held electronically, on secure servers;
- we use encrypted transmission links whenever we can;
- we use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorised access to systems and data;
- we regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems; and
- we restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

9. Disclosure of data

We will not share your personal information with third parties for their own independent marketing or business purposes without your consent. However, we may share your personal information with:

- we may also share your information with certain third parties including business partners, suppliers and sub-contractors and advertisers;
- service providers who provide you with services through us such as your referring broker, money manager and signal providers;
- service providers such as cloud based providers with high security standards;
- service providers that provide services for or on behalf of us, such as companies that help us with data or that verify your identity. These entities are limited in their ability to use your information for purposes other than providing services for us;
- other parties in connection with corporate transactions including a sale or transfer of our company or a business unit, or in the event of a bankruptcy; and
- other parties with your consent or at your direction, an example of the latter being instances where you ask us to send your information to your professional advisors, and
- other parties when required by law or as necessary to protect our services, including instances:
 - a) to comply with the law or respond to compulsory legal process (such as a search warrant or other court order);
 - b) to verify or enforce compliance with the policies governing our services; and
 - c) to protect our rights, property, or safety, or any of our respective affiliates, business partners, or customers;

In the event that The Company discloses information to business parties, for instance, card processing companies or banks, in order to effect the services requested by the clients; such third parties may store your information in order to comply with their legal and other obligations.

10. Access and changes of your data

In compliance with the Law, every user has the multiple rights including accessing and/or amending his personal information, putting a stop to the processing on this data and preventing undesirable marketing.

Subject to the Law, each Company user has the right to request from The Company to correct and/or delete any personal information of him which is inaccurate, irrelevant, excessive, out of data, incomplete, misleading or obtained unlawfully. Moreover, user has the right to request to delete and/or destroy a record of personal information if the Company is no longer authorised to retain such information.

We endeavour to ensure that the personal information we hold is accurate and up to date. We are aware that this information changes frequently with changes of address and other personal circumstances. We may reach out to you from time to time to ask you to update your information or confirm that your information is up to date.

11. Security of Data

The Company took all reasonable steps to implement technical, administrative and physical security measures to protect the personal information and all relevant client data. The sharing context of financial and/or personal information is protected by passwords and followed by encryption. Information and data provided by the client is being stored on secure servers and only authorized employees have access to such data. In addition, the Company take reasonable precautions to prevent the loss, misuse or alteration of any information the Company has been provided with.

12. Contact

If you have any questions regarding this policy, wish to access or change your information or have a complaint, you may contact us at support@cy.conotoxia.com

13. Privacy Policy updates

The Company reserve the right to update Privacy Policy without prior notice. If we decide to change our privacy policy, we will communicate it to you in a way we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.