

Privacy Policy

February 2025

1. INTRODUCTION

Conotoxia Ltd, registered under the laws of Cyprus, with registration number HE 351239 (the “Company” or “Conotoxia”). The Company is a Cyprus Investment Firm regulated by the Cyprus Securities and Exchange Commission (“CySEC”) with license number 336/17.

This Privacy Policy (the “Policy”) describes how Conotoxia (“We”, “our”, “us”) collects and treats personal information of individuals (natural person(s)), obtained through the Company’s website(s), other related sites and/or applications, including but not limited to the use of any of our products, services and/or applications, whether online or otherwise. This Policy does not apply to website(s) operated by other entities and/or other third parties.

The Company is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus therefore, 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 and the Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018).

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 GDPR, the Company will act as data controller and will be responsible for processing of the personal data.

2. PURPOSE OF PRIVACY NOTICE

This Policy aims to give you information on how Conotoxia collects and processes your personal data, through your use of the Company’s website(s), including any data you may provide through the website(s), when you sign up to our website(s) or clients’ Portal.

The Company’s website(s) is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Policy, together with any other privacy notice, or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Policy supplements the other notices and is not intended to override them.

3. COMPANY COMMITMENT

The Company respects the privacy of individual(s) accessing the Company's website(s) and understands the importance of maintaining the confidentiality and privacy of personal information, therefore, we are committed in taking all reasonable steps in safeguarding personal data of client(s) and/or potential client(s), authorized representatives of client(s) and/or potential client(s), beneficiary owners, applicants and visitors. The Company is committed to protect the personal information of individuals, as well as the privacy of client(s) and/or potential client(s) therefore, the Policy provides an explanation of the way the Company treats the information provided by the client(s) and/or potential client(s) and the data which has been collected by the Company.

4. THIRD-PARTY LINKS

The Company's website(s) may include links to third-party websites, plug-ins and applications. Clicking on those links, or enabling those connections, may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

5. DATA COLLECTION

In order to open an account with the Company, you must first complete an application form with certain information that we will require from you. By completing the application form, you are requested to disclose personal information to enable us to evaluate your application and comply with relevant regulatory requirements. The information collected may also be used by the Company to inform you regarding the Company's services.

5.1 THE DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data by law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, only in cases where combine or connect Aggregated Data with your personal data, so that it can directly or indirectly identify you, we shall treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (eg. details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

By personal 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 email 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 (as per anti-money laundering and combating of terrorist financing (“AML/CFT”) regulatory requirements), your jurisdiction of residence, tax identification number (for the purpose of the CRS Decrees, we are required to report your account(s) 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 through correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website(s), subscribe to our service or any other activities carried out on our website(s), 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.

5.2 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - applying for our products or services;
 - creating an account through our website(s);
 - subscribing to our service or publications;
 - requesting marketing to be sent to you;
 - entering a competition, promotion or survey; or
 - giving us some feedback.
- Automated technologies or interactions. As you interact with our website(s), we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other website(s) employing our cookies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources such as Technical Data from analytics providers such as Google, based outside the EU.

6. CONTROLLER

Conotoxia is the controller and responsible for your personal data.

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the customer service department or the DPO using the details set out below.

6.1 CONTACT DETAILS

Name of the Company: Conotoxia Ltd

Name or title of DPO: Fotis Dimitriou

Email address: compliance@cy.conotoxia.com

Postal address: Conotoxia Ltd.

Chrysorroiatissis 11

3032 Limassol, Cyprus

Telephone number: 00357 25 030046

You have the right to make a complaint at any time to the Cyprus Data Protection Commissioner. We would, however, appreciate the chance to deal with your concerns before you approach the Commissioner so, if there are any inquiries, please contact us in the first instance.

7. 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 agreement between us, based on the GDPR.

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

The personal information provided by you, in connection with registering as a user of our website(s), or of the services, can be used only in relation to the agreement between us, establishing and managing your account(s) or a relationship between us, reviewing your ongoing requests/needs, enhancing customer service and products, giving you ongoing information that we believe may be relevant to you, improving our relationship, for AML/CFT and due diligence purposes, for research and statistical purposes and for marketing purposes, as applicable.

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 Service Department. If 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.

We will only use your personal data, as per the regulatory requirements. Most commonly, we will use your personal data in the following circumstances:

- Where necessary of execution/update/modification/monitoring of an agreement with you.
- Where necessary for our legitimate interests (or those of a third party) and your interests; fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending direct marketing communications to you via email or text message (either directly or through third-parties). You have the right to withdraw consent to marketing at any time by contacting us.

8. USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Should you require details about the specific legal ground, you should contact us; as to the processing of your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To register you as a new client	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile	Performance of an agreement with you
To process and deliver your order(s) including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications	(a) Performance of an agreement with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you including: (a) Notifying you about changes to our terms and conditions, the Policy etc (b) Asking you to take a survey	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications	(a) Performance of an agreement with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)

To administer and protect our business and the Company's website(s) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact details (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website(s) content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact details (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website(s) updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact details (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

8.1 HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for five years after they cease being clients, for regulatory purposes.

In some circumstances you can ask us to delete your data: see “Request erasure of your personal data” below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

9.1 PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered our website(s) for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

9.2 THIRD-PARTY MARKETING

We shall request your express opt-in consent before we share your personal data with any entity outside the Conotoxia group of companies, for marketing purposes.

10. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data, by regulatory requirements, or under the terms and conditions of an agreement, we have with you and you fail to provide that data when requested, we may not be able to perform the agreement we have, or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case, at the time.

11. 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 clients, 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 to, pursuant to the legislative provisions, including AML/CFT.

For the purposes of the AML/CFT, personal data shall be processed by the Company solely for the purposes of the relevant regulatory requirements 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, based on the Prevention and Suppression of Money Laundering And Terrorist Financing Laws of 2007-2021 (“AML Law”) the Company is obliged to keep the records of the personal data, related to clients, 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 clients’ due diligence requirements as determined in the AML Law.
- relevant evidence and records of transactions which are necessary for the identification of transactions.
- relevant correspondence documents with clients and other persons with whom a business relationship is maintained.

The subject's right of access personal data may be partially or completely waived, in accordance with the provisions of the GDPR:

- in order to enable the Company or competent national authority to fulfill 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 Law to process data for the purposes of the prevention of money laundering (“ML”) and terrorist financing (“TF”).

12. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Company’s website(s) may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.

The Company’s website(s) 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(s) and using the 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.

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.

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 on your Portal, or if you require any assistance you can contact our Customer Service Department.

13. CHOICE/OPT-OUT

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

If you no longer wish to receive any communication from the Company, you may opt-out 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 erase 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 regulatory requirements, for a period of at least five years after the end of the business relationship).

You can request from us, or third parties, to stop sending you marketing messages at any time, by logging into the website(s) and checking, or unchecking, relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us.

14. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

15. SECURITY AND PROTECTION OF YOUR DATA

The personal information that you provide, when registering 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 to which only authorized 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 unauthorized access to systems and data;
- we regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized 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.

16. 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:

- certain third parties, including business partners, suppliers and subcontractors and advertisers;
- service providers who provide you with services through us, such as your referral(s), money manager(s) 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 the Company, or a business unit, or in the event of a bankruptcy;
- 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 based on regulatory requirements, or as necessary to protect our services, including instances:
 - to comply with the regulatory requirements or respond to compulsory legal process (such as a search warrant or other court order);
 - to verify or enforce compliance with the policies governing our services; and

- to protect our rights, property, or safety, or any of our respective affiliates, business partners, or clients.

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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the regulatory requirements. We do not allow our third-party service providers to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes, and in accordance with our instructions.

17. ACCESS AND CHANGES OF YOUR DATA

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

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

We endeavor to keep personal information held accurate and up to date. We are aware that this information changes frequently, eg. 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.

18. SECURITY OF DATA SECURITY

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

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you, and relevant regulator(s) of a breach, where we are legally required to do so.

19. INTERNATIONAL TRANSFERS

We might need, on certain occasions, for the purposes of carrying out our services to transfer your personal data outside the European Union (“EU”).

Whenever we transfer your personal data out of the EU, we ensure it receives a comparable level of protection, by implementing at least one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in European Union.
- Should we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EU and the US.

19. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights, under the GDPR in relation to your personal data:

- Ø Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Ø Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Ø Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing

(see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Ø Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Ø Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Ø Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Ø Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

20. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances

21. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

22. TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

23. 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

24. PRIVACY POLICY UPDATES

The Company reserves the right to update the Policy without prior notice. If we decide to change the 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.