



# Privacy Policy

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ver. 07.19

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## 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 Processing of Personal Data (Protection of the Individual) Law of 2001, its amendment (Law No. 37(I)/2003) and the Processing of Personal Data (Protection of Individual) (Amending) Law of 2012 (Law No. 105(I)/2012) and the Regulation of Electronic Communications.

## 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.

## 5. 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	Saved currencies and values from the calculator to "/ money transfers" for EN
Remit_Calculator_pl	
Calculator Currency	Saved currencies and values from the calculator to "/ money transfers" for PL
Calculator Currency	
_pk_ses.1.ec2f	Saved currencies and values from the calculator for "/ exchange-currencies" and "/ exchange-currencies / currency-calculator" for PL
_pk_ref.1.ec2f	
_pk_id.1.ec2f	
_hjIncludedInSample	Saved currencies and values from the calculator to "/ exchange-currency" and "/ exchange-currency / currency-converter" for EN
_gid	
_ga	Analytics - visitor behaviour and measuring page performance
_ga_gat_UA-5538840-10	

	<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>
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## 6. 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)

## 7. 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

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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.

## 8. 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;

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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.

## 9. 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.

## 10. 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.

## 11. 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](mailto:support@cy.conotoxia.com)

## 12. 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.