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## **ETFINANCE PRIVACY POLICY**

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This Privacy Policy outlines ETFinance's ("we", "our" or "the Company") practices with respect to information collected from users who access our website at <https://www.etfinance.eu/> ("Site"), register or perform transactions (collectively: "Clients" or "you").

We encourage Clients to carefully read the Privacy Policy and use it to make informed decisions. The protection of privacy and the safeguarding of Clients' personal and financial information are the Company's responsibility and one of its highest priority. By opening a trading account with the Company, the Client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

### **The collection of personal information**

The Company collects the necessary information required to open a Client's trading account, perform transactions and safeguard the Clients' assets and privacy and to provide Clients with the services they require. In this respect, the Company gathers data and information from Clients and/or other sources which will help the Company to construct the Clients' profile based on their requirements and preferences in order to provide its services effectively):

The first type of information is un-identified and non-identifiable information pertaining to a Client(s), which may be made available or gathered via your use of the Site ("Non-personal Information"), even if you do not participate or register to our Site. We are not aware of the identity of a Client from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("Personal Information"). Such information includes:

- Registration information: When you open an account (including demo accounts), provide information when participating in a webinar or subscribe to our newsletter, you will be asked to provide us certain details such as: full name, e-mail address date of birth, residential address, telephone number, and other information, as further described in our Terms and Conditions and Client Account Opening Questionnaire.
- We may also receive information from our global network of business partners which provide us with promotional and advertising services, including lead generation.
- Device Information: We may also collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- Authentication Data (e-signature and/or signature)
- Any communication with the client including electronic and/or telephone communication and/or in person or otherwise
- Payment Information: In order to execute withdrawals and for anti-money laundering purposes, you may be required to share personal information within the site or with our trusted payment processor. Such personal information may include your name, billing

address, identity number, financial information (e.g. your credit card number, bank account, etc.) and any other information that is required in order to perform transactions.

### **Usage of personal information**

The Company uses Clients' personal information only as required to provide services to its Clients, as per the provisions of the Company's Terms and Conditions. This information helps the Company to improve its services, customize browsing experience and enables it to inform its Clients of additional products, services or promotions relevant to Clients and in this respect the Clients hereby consent to the usage of this data for such purposes.

If the Clients do not want to receive information of this nature for any reason, they can contact the Company at the following address: [support@ETFinance.eu](mailto:support@ETFinance.eu).

### **User Rights (For EU Users)**

*You may request to:*

1. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
2. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your personal information that is in our control.
4. Request erasure of your personal information.
5. Object to the processing of personal information by us.
6. Request to restrict processing of your personal information by us.
7. Lodge a complaint with a supervisory authority. However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory and legal requirements/obligations.

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at [DPO@ETFinance.eu](mailto:DPO@ETFinance.eu).

### **Retention**

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing Client personal data, account opening documents, communications and anything else as required by applicable laws and regulations. We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion. Please note that after certain period, we shall keep audio records in encrypted form, for security purposes, which shall be available upon request.

### **Protection of personal information**

Any personal information provided by the Client to the Company will be treated as confidential and shared only within the Company and its affiliates and/or business partners solely for the purposes of the provision of services to the Client, as per the Company's Terms and Conditions, and it will not be

disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

#### **Transfer of data outside the EEA**

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

#### **Corporate transaction**

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

#### **Minors**

We forbid users under the age of 18 to register or trade using our services. In the event the Company becomes aware that a user under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a child under 18 has shared any information with us, please contact us at [support@ETFinance.eu](mailto:support@ETFinance.eu).

#### **Affiliates and Partners**

The Company may share information with affiliates and/or other business partners in the event such information is reasonably required by such affiliate and/or business partner in order to provide the products or services to its Clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet Clients' needs, and which are delivered in a manner that is useful and relevant only where Clients have authorized the Company to do so.

Out of respect to Clients right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

#### **Non-affiliated third parties**

The Company does not sell, license, lease or otherwise disclose Clients' personal information to third parties, except as described in this Privacy Policy.

The Company reserves the right to disclose personal information to third parties where required by law, regulatory and other government authority. The Company may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to its Clients.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, Client service, Client satisfaction surveys or other data collection activities

relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its Clients the required level of protection.

## **MARKETS**

In cases where Clients have been introduced by a Business partner such Business partner may have access to Clients' information. Hence, Clients hereby consent to the sharing of information with such Business partner.

### **Restriction of responsibility**

The Company is not responsible for the privacy policies or the content of sites to which [www.etfinance.eu](http://www.etfinance.eu) links and has no control of the use or protection of information provided by the Clients or collected by those sites. Whenever a Client elects to link to a co-branded web site or to a linked web site, the Client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

### **Use of "COOKIES"**

The Company uses cookies to secure Clients' trading activities and to enhance the performance of the [www.etfinance.eu](http://www.etfinance.eu) website. Please refer to our [Cookie Policy](#) for more information.

### **Privacy Policy Updates**

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses Clients' personal information, the revised Privacy Policy will be uploaded in the Company's website. In this respect, the Clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its Clients. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The last revision will be reflected in the "Last modified" section. Your continued use of the Site or services, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

How to contact us If you have any general questions about the Site or the information, we collect about you and how we use it, you can contact us at [DPO@ETFinance.eu](mailto:DPO@ETFinance.eu).