

## PRIVACY POLICY

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## PRIVACY POLICY

1.1. This Privacy Policy ("**Policy**") explains the privacy practices employed by '**ARUMPRO CAPITAL LIMITED**' (the "**Company**" and/or "**We**", and/or "**Us**") in providing services to its clients ("**Client**" and/or "**You**").

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### A. WHO WE ARE?

1.1. '**ARUMPRO CAPITAL LIMITED**' is a Cypriot Investment Firm ("**CIF**") within the meaning of Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets, having its registered office at 2 Gregory Afxentiou street, 2<sup>nd</sup> Floor, 4003 Limassol, Cyprus.

1.2. The Company is authorized, licensed and regulated as a Cyprus Investment Firm ('**CIF**') by the Cyprus Securities and Exchange Commission ('**CySEC**') under license number 323/17 and is operating in accordance with the Markets in Financial Instrument Directive 2014/65/EU and its implementing measures ("**MIFID II**") and Regulation 2014/600/EU ("**MIFIR**"), as transposed into Cyprus law by Cyprus Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets and its implementing measures (the "**Investment Services Law**") and its activities include, transmission and execution of client orders in financial instruments, including through the use of electronic trading platform(s).

1.3. The Company is subject to EU Regulation (EU) 2016/679 (the "**General Data Protection Regulation**" or "**GDPR**"). In Cyprus, a national law supplementing the GDPR was enacted in July 2018 (L.125(I)/2018).

#### B. PURPOSE OF THIS PRIVACY NOTICE

1.4. This privacy notice aims to give you information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to any of the services offered by the Company.

1.5. This website is not intended for children and we do not knowingly collect data relating to children.

1.6. It is important that you read this privacy notice 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 privacy notice supplements the other notices and is not intended to override them.

1.7. This Privacy Policy is based on data protection rules and principles deriving from applicable law such as the Processing of Personal Data (Protection of Individuals) Law of 2001, as amended in 2003, the Regulation of Electronic Communications and Postal Services Law of 2004 and the General Data Protection Regulation (GDPR) (EU) 2016/679 effected as from the 25th of May 2018.

## **C. CONTROLLER**

- 1.8. We are acting as the controller and responsible for your personal data.
- 1.9. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## **D. CONTACT DETAILS**

DPO:	Data Protection Officer (DPO)
E-mail address:	<a href="mailto:dpo@arumcapital.eu">dpo@arumcapital.eu</a>
Postal address:	<b>ARUMPRO CAPITAL LIMITED</b> 2 Gregory Afxentiou street, 2 <sup>nd</sup> Floor 4003 Limassol Cyprus
Telephone number:	+(357) 25 222 094

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

## **E. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

- 1.11. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **F. THIRD-PARTY LINKS**

- 1.12. This website 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.

## **2. THE DATA WE COLLECT ABOUT YOU**

- 1.13. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 1.14. We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together follows:

### **a) Application information**

- 1.15. Personal information Client provides to the Company in its application form, such as name, address, date of birth, email address, income and income source etc. in order to facilitate the evaluation of

Client's application. The information provided is also used for the purposes of communicating with the Clients.

#### **b) Transaction information**

- 1.16. Information about the anticipated volume and value of Client's transactions with us and income information provided in order to enable the construction of Client's economic profile.

#### **c) Verification information**

- 1.17. Information necessary to verify Client's identity, such as an identification card, passport or driver's license. This also includes background information the Company receives about the Client from public records or from other entities not affiliated with the Company.
- 1.18. 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 in 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, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy notice.
- 1.19. We do not collect any **Special Categories of Personal Data** about you (this includes 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.

### **3. IF YOU FAIL TO PROVIDE PERSONAL DATA**

- 1.20. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel the contractual relationship you have with us but we will notify you if this is the case at the time.

### **4. HOW IS YOUR PERSONAL DATA COLLECTED?**

- 1.21. We use different methods to collect data from and about you including through:
- a) Direct interactions
- 1.22. You may give us your personal data by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes personal data you provide when you:
- apply for our products or services;

- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

b) Automated technologies or interactions

1.23. As you interact with our website, 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 websites employing our cookies.

c) Third parties or publicly available sources

1.24. 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;

## **5. HOW WE USE YOUR PERSONAL DATA**

### **A. CIRCUMSTANCES IN WHICH WE MAY USE YOUR PERSONAL DATA**

- 1.25. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- Where we need to perform the contract that we are about to enter into or have entered into with you.
  - Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - Where we need to comply with a legal or regulatory obligation.
- 1.26. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.
- 1.27. You have the right to withdraw consent to marketing at any time by contacting us at the following email: [dpo@arumcapital.eu](mailto:dpo@arumcapital.eu)

**B. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

- 1.28. 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.
- 1.29. 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.
- 1.30. Please Contact us at email: [dpo@arumcapital.eu](mailto:dpo@arumcapital.eu) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
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 a contract with you
To process and deliver your order 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 a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact details (c) Proof of address document	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests



<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
(b) Asking you to leave a review or take a survey	(d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications	(to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (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 reorganization or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website 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, client 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 updated and relevant, to develop our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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)

**C. MARKETING**

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

**D. PROMOTIONAL OFFERS FROM US**

1.32. 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.

1.33. 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 for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

**E. THIRD-PARTY MARKETING**

1.34. We will get your express opt-in consent before we share your personal data with any company outside the Company's group of companies for marketing purposes.

**F. OPTING OUT**

1.35. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website 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 at any time at the following email address: [dpo@arumcapital.eu](mailto:dpo@arumcapital.eu)

**G. COOKIES**

1.36. The Company's Technology provider may use "cookies" and other tracking technologies to collect Anonymous Information. A "cookie" is a small text file stored by a web browser when users access a

website. Cookies enable the website browser to save and identify the user's browsing activity and individual preferences, for example, to collect information about the User's activity in relation to the Services and it may serve to recall Personal Data previously indicated by a User, such as his/her user ID and password for access to the Service(s).

1.37. In particular, the Company's technology providers might be using "Flash Cookies" and/or local storage technologies to help users access the Client's accounts seamlessly and save their account settings to their browsers. Do note that most browsers allow controlling cookies, including whether or not to accept them and how to remove them.

#### **a) Reasons why the Company is using Cookies**

1.38. Cookies are used on the Company's website to:

- Identify the web browser and the settings;
- Verify our client's identity to ensure his/her personal data protection;
- Remember the client's individual preferences.

#### **b) How are Cookies used by the Company?**

1.39. Cookies are downloaded by your browser whenever you access our websites. The stored data is used to track your browsing path and the pages you visit most frequently.

1.40. Your privacy is important to us, so the gathered information will be stored for a period not less than the one we are required to observe in order to comply with the applicable rules and regulations.

1.41. Cookies are commonly introduced to improve the efficiency of websites. By tracking our user's behavior, we seek to make our website more user-friendly and tailored to your preferences.

1.42. You can, if you wish, 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 this website may become inaccessible or not function properly.

1.43. Cookies do not contain any executable code or software viruses. Instead, it is more like your personal ID that is updated whenever you access our website.

#### **H. RECORDING OF TELEPHONE CONVERSATIONS, ELECTRONIC COMMUNICATIONS, INTERNET CONVERSATIONS (LIVE CHATS), AND MEETINGS**

1.44. We are required by law to record and maintain for a minimum period of five (5) years from the date of the recording, all telephone conversations, electronic messaging, e-mails, internet conversations (chat), meetings and other communications we have with you in the course of us providing our services to you.

- 1.45. A copy of any such recordings will be available to you on request for a minimum period of five (5) years from the date of the recording.
- 1.46. Any recordings shall be and shall remain our sole property and will be accepted by you as conclusive evidence of their content as recorded by us. You agree that we may deliver copies of transcripts of such recordings to any court, regulatory or government authority, including without limitation, in disputes, which may arise between you and us.
- 1.47. However, technical reasons may prevent us from recording a conversation, and recordings or transcripts made by us will be destroyed in accordance with our normal practice. Consequently, you should not rely on such recordings to be available.
- 1.48. You have the right to withdraw your consent in relation to the recording of telephone conversations, electronic messaging, e-mails, internet conversations (chat), meetings and other communications we have with you, by informing us in writing.
- 1.49. However, as the latter is a regulatory requirement, in case you refuse or revoke your consent, we may be unable to provide our services to you; thus, your access and/or use of our services may be restricted or terminated.

#### I. CHANGE OF PURPOSE

- 1.50. 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 at the following email: [dpo@arumcapital.eu](mailto:dpo@arumcapital.eu)
- 1.51. 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.
- 1.52. 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.

#### 6. DISCLOSURES OF YOUR PERSONAL DATA

- 1.53. We may have to share your personal data with third parties for the purpose of carrying out our services but should this be the case we check the issue
- 1.54. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

## **7. INTERNATIONAL TRANSFERS**

- 1.55. We might need on certain occasions for the purposes of carrying out our services to transfer your personal data outside the European Economic Area (EEA).
- 1.56. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- 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 Europe.
  - Where 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 Europe and the US.
- 1.57. Please contact us at [dpo@arumcapital.eu](mailto:dpo@arumcapital.eu) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **8. DATA SECURITY**

- 1.58. 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.
- 1.59. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. DATA RETENTION**

### **A. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

- 1.60. 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.
- 1.61. 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.

1.62. By law, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five (5) years after they cease being customers for regulatory purposes.

## **B. ERASURE OF YOUR PERSONAL DATA**

1.63. In some circumstances, you can ask us to delete your data: see **Request Erasure** below for further information.

1.64. 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.

## **10. YOUR LEGAL RIGHTS**

### **A. THE VARIOUS RIGHTS YOU HAVE**

1.65. Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **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.
- **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.
- **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.
- **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 affects 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.
- **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.

- **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.
- **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.

1.66. If you wish to exercise any of the rights set out above, please contact us as follows:

DPO:	Data Protection Officer (DPO)
E-mail address:	<a href="mailto:dpo@arumcapital.eu">dpo@arumcapital.eu</a>
Postal address:	<b>ARUMPRO CAPITAL LIMITED</b> 2 Gregory Afxentiou street, 2 <sup>nd</sup> Floor 4003 Limassol Cyprus
Telephone number:	+(357) 25 222 094

## **B. NO FEE USUALLY REQUIRED**

1.67. 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.

## **C. WHAT WE MAY NEED FROM YOU**

1.68. 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).

1.69. 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.

## **D. TIME LIMIT TO RESPOND**

1.70. We try to respond to all legitimate requests within one (1) month.



1.71. 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.

## **11. REVIEWING THIS POLICY**

1.72. We encourage our Clients and visitors of our website(s) to review this Privacy Policy periodically, so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it.

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