

PRIVACY POLICY

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'FinPros.com' is a domain owned and operated by 'FinPros Financial Ltd', a company registered in Seychelles with company registration number: 8429300-1, having its registered office at CT House, Office 9A, Providence, Mahé, Seychelles. 'FinPros Financial Ltd' is regulated by the Financial Services Authority ('FSA') of Seychelles as a Securities Dealer with License number: SD087. Finquotes Management LTD, a Company incorporated in Cyprus with registration number HE433355, having its registered office at Georgiou Gennadiou 10, Agathangelos Court, 3rd floor, Flat 303, 3041, Limassol, Cyprus, is appointed as the merchant and seller of services, and is also the Appointed Independent Representative and Distributor of the regulated entity.

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PRIVACY POLICY

This Privacy Policy ("**Policy**") explains the privacy practices employed by 'FinPros Financial Ltd' (the "**Company**", "**we**", "**our**" 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. '**FinPros.com**' is a domain owned and operated by '**FinPros Financial Ltd**', a company registered in Seychelles with company registration number: 8429300-1, having its registered office at CT House, Office 9A, Providence, Mahé, Seychelles.

1.2. The Company is regulated by the Financial Services Authority ('**FSA**') of Seychelles, as a Securities Dealer with License number: SD087.

B. PURPOSE OF THIS PRIVACY POLICY

1.3. This Privacy Policy 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.

1.4. Our website is not intended for minors under the age of eighteen (18) and we do not knowingly collect data relating to minors under the age of eighteen (18).

1.5. It is important that you read this Privacy Policy together with any other Privacy Policy 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 Policy supplements the other notices and is not intended to override them.

1.6. We are a financial services provider and recognize the utmost importance of protecting our clients' privacy. We have policies to maintain the confidentiality and security of your

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nonpublic personal information. The following Policy is designed to help you understand what information we collect from you and how we use that information to serve your account(s).

1.7. This Privacy Policy is based on data protection rules and principles derived from the applicable laws, rules and regulations, such as:

a) Article 20(1)(b) of the Constitution of the Republic of Seychelles, which provides that every person has a right not to be subjected without their consent or an order of the Supreme Court, to the interception of the correspondence or other means of communication of that person either written, oral, or through any medium; as well as,

b) the Seychelles Data Protection Act 2002 (Act 9 of 2003) ('the Act') which was enacted in 2003 to provide individuals with privacy rights regarding the processing of Personal Data (but which at the time of writing, has not yet entered into force) (the "**Information Protection Law**"); and

c) as regard Clients who are located in the European Union, and because all our Clients' Personal Data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on specially protected servers maintained in the United Kingdom and/or in the European Union, the General Data Protection Regulation (the "**GDPR**") (EU) 2016/679, which entered into effect as of the 25th of May 2018.

1.8. In line with the foregoing, for the purposes of this Privacy Policy, we follow the principles of the strictest and most elaborate of the above-mentioned legal instruments, *i.e.*, the GDPR. Even though, strictly speaking, the GDPR is not applicable to us, other than with regard to Clients located in the European Union, we consider the GDPR as an exemplary model and guidance, as far as the privacy and data protection of our Clients is concerned. Furthermore, as indicated further below, all your Personal Data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on specially protected servers maintained by the Company or its contractors, either in the United Kingdom and/or in the European Union, and all processing operations are, therefore, carried out pursuant to and in accordance with the principles set out in the GDPR.

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C. CONTROLLER & PROCESSOR

1.9. In line with the foregoing, we are acting both as the '**controller**', *i.e.*, the person who determines the purpose and means of Personal Data processing (this can be determined alone, or jointly with another person/company/body), as well as the '**processor**', *i.e.*, the person who carries out the actual processing of the data under the specific instructions of the data controller, responsible for your Personal Data.

D. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

1.10. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data change during your relationship with us.

E. THIRD-PARTY LINKS

1.11. Please note that our 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.

1.12. 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 Policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

2.1 '**Personal Data**' as defined in the GDPR means any information relating to an identified or identifiable natural person; a natural person is considered as being identifiable, directly or indirectly, in particular by means of an identifier such as a name, an identification number, location data, an online identifier or one or more special characteristics expressing the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person can be identified. This includes all information about your identity such as your name, your e-mail address or postal address, your customer number and online identifiers. Information that cannot be linked to your identity (such as the registration number of online users), on the other hand, is not personally identifiable

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information. In addition, Personal Data do not include data where the identity has been removed ('**anonymized data**').

2.2 You can use our online and mobile services without revealing your identity and without providing any Personal Data. When using our website(s) and/or online trading platforms, our client portal, the apps and some services of our website(s) and apps, however, will collect your personal information.

2.3 We have grouped together the different kinds of Personal Data about you, which we may collect, use, store and transfer, as follows:

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A. APPLICATION INFORMATION

2.4 You can register as a user of our online and mobile services. To do this you must enter the data requested, for example name, address and e-mail address. We also record the date and time of registration and the IP address. As part of the registration process, we obtain your consent regarding the use of the data. Such personal information, which you provide to us in your account opening application form or registration, such as name, address, date of birth, email address, income and income source etc. are used in order to facilitate the evaluation of your application. The information provided is also used for the purposes of communicating with you via telephone, e-mail or chat.

2.5 The legal basis for the processing of such data for registration is Art. 6(1)(a) GDPR. Insofar as you register for the fulfilment or initiation of a contract with us, the legal basis for the processing of the data is additionally Art. 6(1)(b) GDPR.

2.6 Registration is required to fulfil or initiate a contract with us for certain services.

2.7 The data will be stored by us for as long as necessary to fulfil the contract. In addition, we store these data for the fulfilment of post-contractual obligations and due to commercial and tax retention periods for the statutory period. This retention period is usually five (5) years at the end of the respective calendar year.

B. TRANSACTION INFORMATION

2.8 Information about the anticipated volume and value of your transactions with us and income information provided in order to enable the construction of your economic profile.

C. VERIFICATION INFORMATION

2.9 Information necessary to verify your identity, such as an identification card (ID), passport or driver's license. This also includes background information the Company receives about you from public records or from other entities not affiliated with the Company.

D. AGGREGATED DATA

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2.10 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 per se, as these data does not directly or indirectly reveal your identity.

2.11 For example, we may aggregate your '**Usage Data**' (i.e., data is collected on what the user is doing at his/her electronic terminal/device) 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 used to identify you, we treat the combined data as Personal Data, which will be used in accordance with this Privacy Policy.

E. SPECIAL CATEGORIES OF DATA

2.12 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).

2.13 We do not collect any information about criminal convictions and offences, except, as part of our customer due diligence ('KYC – Know Your Customer'), where such information is publicly available.

3. LEGAL BASIS OF DATA PROCESSING

3.1 Insofar as we obtain consent for the processing of your Personal Data, Art. 6(1) lit. (a) GDPR serves as the legal basis for data processing.

3.2 Insofar as your Personal Data is processed because this is necessary to fulfil a contract or in the context of a contract-like relationship with you, Art. 6(1) lit. (b) GDPR serves as the legal basis for data processing.

3.3 Insofar as we process your Personal Data in order to fulfil a legal obligation, Art. 6(1) lit. (c) GDPR serves as the legal basis for data processing.

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3.4 As a legal basis for the data processing, Art. 6(1) lit. (f) GDPR applies if the processing of your Personal Data is necessary to safeguard the legitimate interests of our Company or a third party and your interests, fundamental rights and fundamental freedoms do not require the protection of your Personal Data.

3.5 As part of this Privacy Policy, we will always state the legal basis on which we base the processing of your Personal Data.

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4. IF YOU FAIL TO PROVIDE PERSONAL DATA

4.1 Where we need to collect Personal Data by law, or under the terms of a contract that we have with you, and you fail to provide such data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

4.2 In this instance, we may have to cancel the contractual or pre-contractual relationship you have with us, but we will notify you if this is the case at the time.

5. HOW ARE YOUR PERSONAL DATA COLLECTED?

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

A. DIRECT INTERACTIONS

5.2 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.

5.3 The legal basis for the processing of these data is Art. 6(1)(f) GDPR. At the same time, the above-mentioned purposes justify the legitimate interest within the meaning of Art. 6(1)(f) General Data Protection Regulation (GDPR).

B. AUTOMATED TECHNOLOGIES OR INTERACTIONS

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5.4 Each time you access our online and mobile services, we collect the following information about the device you are using: the IP address, the request from your browser, and the date and time of this request. In addition, the status and the amount of data transferred are recorded as part of this request. We also collect product and version information about the browser used and the operating system of the device, as well as the Internet service provider. We continue to track which website accessed the service. We collect such technical data by using cookies, server-logs and other similar technologies (see further below: '**Use of Cookies and Other Tracking Technologies**').

5.5 While such technical data, as such, are not considered Personal Data per se, as these data do not directly or indirectly reveal your identity, we may combine or connect such technical data with your Personal Data so that it can directly or indirectly identify you. In these circumstances, we treat the combined data as Personal Data, which will be used and/or processed in accordance with this Privacy Policy.

5.6 The legal basis for the processing of these data is Art. 6(1)(f) GDPR.

5.7 We process such data so that the content, for example the website, can be displayed on your device. In addition, we use the data for the operation of the online and mobile services and to detect and eliminate errors, to determine the utilization of our online and mobile services and to make adjustments or improvements.

5.8 At the same time, these purposes justify the legitimate interest within the meaning of Art. 6(1)(f) General Data Protection Regulation (GDPR).

5.9 The IP address of your device will be stored only for the time of use of the online or mobile services and then deleted or shortened. These data are stored for a limited period of time (see further below).

C. THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES

5.10 We may receive Personal Data about you from various third parties and public sources, for instance, from analytics providers, such as Google, some of whom may be based outside the EU (see further below: '**Use of Cookies and Other Tracking Technologies**').

6. HOW WE USE YOUR PERSONAL DATA

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A. CIRCUMSTANCES IN WHICH WE MAY USE YOUR PERSONAL DATA

6.1 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 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.

6.2 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.

6.3 You have the right to withdraw consent to marketing at any time by contacting us.

B. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

a) Overview

6.4 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.

6.5 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.

6.6 Please contact us 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.

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new Client	(a) Identity (b) Contact details (c) Proof of address document	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) Transaction (e) 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 (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact details (c) Proof of address document (d) Transaction (e) Marketing and Communications	(a) Performance of a contract 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 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)

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

b) Marketing & Promotional Offers from Us

6.7 We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

6.8 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.

6.9 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 instance, if you have not opted out of receiving that marketing.

c) Third-Party Marketing

6.10 We will get your express opt-in consent before we share your Personal Data with any company outside our group of companies for direct marketing purposes.

d) Opting Out of Marketing Messages

6.11 You can ask us or third parties to stop sending you marketing messages at any time by contacting us with your request.

7. USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

7.1 We use '**cookies**' and other tracking technologies to collect certain information about your browser and related activities on our website(s) and online trading platforms. These are small text files that are stored on an electronic device to facilitate certain settings and data for sharing with us online about your browser and activity on our website(s) and trading platforms.

7.2 A cookie usually contains the name of the domain from which the cookie file was sent, as well as information about the age of the cookie and an alphanumeric identifier. Depending on content and storage duration, there are different types of cookies. Most of the cookies we use are so-called '**session cookies**', which are deleted when you end your browser session. In addition, there are some long-lasting cookies by which we are able to recognize you as a visitor. Many cookies come directly from us, in addition, the storage

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and evaluation of individual cookies come from service providers (so-called '**third-party cookies**').

7.3 In addition, our website(s), HTML emails and certain third party service providers may also use other tracking technologies, such as '**flash cookies**', '**web beacons**' or '**pixels**' and/or other local storage technologies to help users access their Client's accounts seamlessly and save their account settings to their browsers. These are typically small transparent images that provide us with statistics, for similar purposes as cookies. They are often used in conjunction with cookies, though they are not stored on your computer in the same way. As a result, if you disable cookies, web beacons may still load, but their functionality will be restricted.

7.4 We inform you about the use of cookies and such other tracking technologies in advance, with a corresponding note on a banner.

7.5 Some cookies are technically required in order to enable you to use our online and mobile services. These cookies allow us to collect and store the following data:

- Language settings;
- Search settings;
- Contents of an online form;
- Information for identifying or authenticating the user;
- Information to identify the web browser and the corresponding settings;
- Information to verify our Client's identity to ensure their Personal Data protection;
- Information to remember each Client's individual preferences.

7.6 In addition, on our website(s) and trading platforms, we use cookies that allow an analysis of your user behavior, so-called '**analysis cookies**'. These cookies allow us to collect and store the following data:

- Frequency of page views
- Searches
- Use of Internet page functions

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7.7 Your data collected by means of cookies are 'anonymized' so that the data cannot be matched to the respective user.

7.8 The legal basis for the processing of data by means of cookies is Art. 6(1)(f) GDPR.

7.9 Cookies allow us to recognize your computer and make any presets available immediately. Cookies help us to improve the online offer and offer you a better and more user-friendly service. The use of cookies is necessary to make the use of our online offers easier. Some features can only be offered through the use of cookies. This concerns the search, online forms, customer account, shopping cart and notepad.

7.10 We use analysis cookies to improve and optimize the quality of our online offers and their content.

7.11 At the same time, these purposes justify the legitimate interest within the meaning of Art. 6(1)(f) General Data Protection Regulation (GDPR).

7.12 The technically necessary cookies we use are so-called '**session cookies**', which are automatically deleted after the end of the browser session. The remaining cookies are stored on your computer. You can delete these saved cookies yourself at any time. Most browsers are also set to accept cookies automatically. However, you can disable the storage of cookies or set your browser to notify you when cookies are sent. Please note that you may be limited or unable to use our online service if you refuse to accept cookies.

7.13 For more details on how we use cookies and/or other storage/tracking technologies, which cookies and other storage/tracking technologies we use and how to manage cookies and/or the other storage/tracking technologies we use, please consult our '**Cookies Policy**'.

8. ANALYSIS AND TARGETING TOOLS

A. GOOGLE SERVICES

8.1 On our website, we use various services provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter referred to as "**Google**").

8.2 For more information about Google services, please visit http://www.google.com/privacy/ads/.

B. GOOGLE ANALYTICS

8.3 We use Google Analytics for statistical analysis. Google Analytics is a web analytics service provided by Google LLC., 1600 Amphitheater Parkway, Mountain View, CA 94034, USA ("**Google**"). Google Analytics uses so-called "cookies", text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. However, if IP anonymization is activated on this website, your IP address will be shortened by Google beforehand within member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website activity and Internet usage to the website operator. The IP address provided by Google Analytics as part of Google Analytics will not be merged with other Google data. You can prevent the storage of cookies by using a corresponding setting on your browser software; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible. In addition, you may prevent the collection by Google of the data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of these data by Google by downloading and installing the browser plug-in available under the following link: http://tools.google.com/dlpage/gaoptout?hl=de/

8.4 For more information, see http://tools.google.com/dlpage/gaoptout?hl=de/ or http://www.google.com/intl/de/analytics/privacyoverview.html (general information about Google Analytics and privacy). We point out that on our website(s), Google Analytics was extended under the code "anonymizeIp ();" in order to anonymize the IP addresses, whereby the last octet is deleted.

C. RETARGETING AND REMARKETING

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8.5 Retargeting or remarketing refers to technologies in which users who have previously visited a certain website are shown appropriate advertising even after leaving this website. For this purpose, it is necessary to recognize Internet users beyond their own website, for which purpose cookies of the corresponding service providers are used. In addition, the previous usage behavior is considered. For example, if a user views certain products, they may later display these or similar products as advertisements on other websites. It is personalized advertising that is adapted to the needs of each user. It is not necessary for this personalized advertisement to be identified beyond the recognition of the user. The data used for the retargeting or remarketing will therefore not be merged with other data.

8.6 We use such technologies to display ads on the Internet. We use third-party providers to deliver such ads. We use, among other things, offers from Google, which allows an automatic display of interesting products for the Internet user. This function is implemented by 'cookies'. For more information about this technology, see https://policies.google.com/privacy?gl=de under the following URL: https://policies.google.com/privacy?hl=de. The installation of cookies for Google Remarketing and Google AdWords Conversion Tracking can be prevented by setting the respective browser software by accessing the following website: http://www.google.com/policies/privacy/ads/ and changing the corresponding setting.

8.7 We use Google Retargeting Tags, Appnexus and We use Google Retargeting Tags, Appnexus and Performance Profiles to promote our services and products. The retargeting JavaScript codes implemented on our website(s) store a cookie on the user's computer for the purpose of retargeting. At a later date, the user will be provided with our banners or text ads, provided that the user acts on Google Search websites as well as Google's Display Networks, Appnexus and Performance Profiles. All data is recorded anonymously so that it is not possible to draw any conclusions about specific persons. Users can opt out of retargeting functionality by modifying the Google Remarketing Tags display or disabling retargeting. Alternatively, users may disable the use of third-party cookies by using the network advertising initiative's opt-out page or object to each network individually.

D. GOOGLE CONVERSION TRACKING

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8.8 We also use Google's Conversion Tracking in this context. When you click on an ad served by Google, a 30-day conversion-tracking cookie will be placed on your device. These cookies are not for personal identification. The information gathered using the conversion cookie is used to generate conversion statistics for Google Ads advertisers.

8.9 The legal basis for this data processing is legitimate interest pursuant to Art. (6)(1)(f) GDPR.

8.10 You can disable Google interest-based ads on your browser by turning off http://www.google.com/settings/ads or opting out ate the following URL: http://www.aboutads.info/choices/.

E. FURTHER SERVICES OF THE GOOGLE MARKETING PLATFORM

8.11 In addition, our website(s) use(s) further services of the Google Marketing Platform (previously "**Google doubleclick**"). These services use cookies to serve ads that are relevant to users, to improve campaign performance reports or to prevent a user from receiving ads multiple times.

8.12 Google uses a cookie ID to record which ads are played in which browser and thus prevents them from being displayed multiple times. In addition, Google can use cookie IDs to track what are known as conversions, i.e. whether a user sees an advertisement and later goes to the advertiser's website and buys something there. According to Google, such cookies do not contain person information.

8.13 Your browser automatically establishes a direct connection to the Google server. We have no influence on the extent and further use of the data collected through the use of this tool by Google. According to Google, through the involvement of these services, Google receives the information that you have accessed the relevant part of our website or clicked on an ad from us. If you are registered with a service of Google, Google can assign the visit to your user account. Even if you are not registered with Google or have not logged in, there is a chance that the provider will find out and store your IP address.

8.14 In addition, the Google cookies allow us to understand whether you are performing certain actions on our website after you have viewed or clicked on one of our ads on Google or on another platform (Conversion Tracking) ("Floodlight"). Google uses this cookie to

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understand the content with which you have interacted on our web sites so that it can later send you targeted advertising.

8.15 You can prevent the tracking process by setting your browser software accordingly (e.g. third party cookies disabled), deactivate the cookies for conversion tracking by blocking cookies from the domain www.googleadservices.com in your browser settings, at www.google.com/settings/ads, for interest-based ads of the providers that are part of the About Ads self-regulatory campaign, via the link http://www.aboutads.info/choices or the link http://www.google.com/settings/ads/. We point out that in this case you may not be able to use all the features of this offer in full.

8.16 For more information about the Google Marketing Platform, please visit https://marketingplatform.google.com/. You can also find more information from the Network Advertising Initiative (NAI) at http://www.networkadvertising.org/.

8.17 The legal basis for the data processing is your consent pursuant to Art. (6)(1)(a) GDPR.

F. FACEBOOK CUSTOM AUDIENCES

8.18 Our website(s) use(s) the "Custom Audiences" remarketing feature of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (hereinafter referred to as '**Facebook**'"). This allows users of the website to be shown interest-based advertisements ("**Facebook Ads**") as part of their visit to the social network Facebook or other websites that also use the process. We are interested in showing you advertisements that are of interest to you in order to make our online offers more interesting to you.

8.19 The legal basis for the processing of your data is legitimate interest pursuant to Art. 6(1(1)(f) GDPR.

8.20 The use of Custom Audience means your browser automatically establishes a direct connection to the Facebook server. We have no influence on the extent and further use of the data collected through the use of this tool by Facebook and therefore inform you that, according to our knowledge: By integrating Facebook Custom Audiences, Facebook receives the information that you have accessed our website or have clicked on an ad from us. If you are registered with a service of Facebook, Facebook can assign the visit to your Facebook account. Even if you are not registered with Facebook or have not logged

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in, there is a chance that the provider will process your IP address and other identifying features.

8.21 Disabling the "Facebook Custom Audiences" feature is available to logged-in users at https://www.facebook.com/settings/?tab=ads#.

8.22 For more information about data processing through Facebook, please see: https://www.facebook.com/about/privacy.

G. OTHER WEB ADVERTISING PLATFORMS WE USE

8.23 Other web advertising platforms we use include 3LIFT, Adroll, bidswitch, Bing, Criteo, OpenX, Outbrain, Taboola, Yahoo and Yandex. These web-advertising platforms display boxes of links to our website(s) within other websites.

8.24 These web advertising platforms use cookie IDs to serve ads that are relevant to users, to improve campaign performance reports or to prevent a user from receiving ads multiple times. In addition, these web advertising platforms can use cookie IDs to track what are known as conversions, i.e. whether a user sees an advertisement and later goes to the advertiser's website and registers there. According to our information, such cookies do not contain personal information.

8.25 Your browser automatically establishes a direct connection to the servers of these web-advertising platforms and we have no influence on the extent and further use of the data collected through the use of these tools. According to our understanding, through the involvement of these services, these web-advertising platforms receive the information that you have accessed the relevant part of our website or clicked on an ad from us. If you are registered with a service of these web-advertising platforms, they can assign the visit to your user account. Even if you are not registered with these web-advertising platforms or have not logged in, there is a chance that the provider will find out and store your IP address.

8.26 The legal basis for the data processing is your consent pursuant to Art. (6)(1)(a) GDPR.

8.27 You can prevent the tracking process by setting your browser software accordingly (e.g. third party cookies disabled), deactivate the cookies for conversion tracking by blocking

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cookies from the domains of the above-mentioned web advertising platforms in your browser settings and for interest-based ads of the providers that are part of the About Ads self-regulatory campaign, via the link http://www.aboutads.info/choices. We point out that in this case you may not be able to use all the features of the offers displayed on these web-advertising platforms in full.

9. SOCIAL MEDIA PLUGINS

9.1 Our website(s) use(s) the Facebook social media plug-in of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (hereinafter referred to as "Facebook").

9.2 An overview of Facebook plug-ins can be found at the following URL: http://developers.facebook.com/docs/plugins; you can find further information on Facebook's Privacy Policy at the following link: www.facebook.com/policy.php.

9.3 Facebook may receive the information that you have accessed the corresponding website of our online service and possibly interacted with the plug-in. By activating the plug-in, your personal data will be saved and sent to Facebook in the USA.

9.4 We have no influence on the collected data and data processing operations, nor are we aware of the full extent of data collection, the purpose of the processing, or the retention periods. We also have no information on how to delete the data collected by Facebook.

9.5 As far as we know, Facebook stores the data collected about you as usage profiles and uses them for purposes of advertising, market research and/or tailor-made website design. Such an evaluation is carried out in particular (also for non-logged-in users) for the presentation of needs-based advertising and to inform other users of the social network about your activities on our website. You have a right to object to the formation of these user profiles, whereby you must exercise this right to Facebook.

9.6 Through the plug-ins, we offer you the opportunity to interact with the social networks and other users, so that we can improve our offer and make it more interesting for you as a user.

9.7 The legal basis for the use of the plug-ins is legitimate interest pursuant to Art. 6(1)(f) GDPR.

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9.8 You can completely prevent the plug-ins from being loaded using add-ons for your browser, so-called script blockers.

10. SOCIAL MEDIA PRESENCE

A. NOTE REGARDING OUR FACEBOOK PAGE

10.1 Accessing https://www.facebook.com/finproscom/ will take you to our page on the Facebook.com social network of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland (hereinafter referred to as "Facebook"). If you visit our page, Facebook collects data and processes it in the US, if necessary.

10.2 This also happens if you yourself are not a registered user of Facebook or simply have not logged in to your Facebook account. According to information provided by Facebook, the data collected includes, among other things, the IP address, operating system information, hardware versions and browser type, data collected from Facebook cookies about your user behavior, and other technical data.

10.3 Please refer to the Facebook Privacy Policy, which you can access here: https://www.facebook.com/privacy/explanation. You can also find information from Facebook about cookies on https://www.facebook.com/policies/cookies.

B. NOTE REGARDING TWITTER

10.4 We operate the Twitter account https://twitter.com/fin_pros on the short message service, Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, (hereinafter referred to as "Twitter"). The body responsible for the data processing of persons living outside of the United States is Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland.

10.5 When you use Twitter, your personal data are collected, transmitted, stored, disclosed and used by Twitter, transmitted, stored and used wherever you reside in the United States, Ireland and any other country in which Twitter operates.

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10.6 We have no influence on the processing of the collected data, as it is performed solely by Twitter. Information about which data are processed by Twitter and used for which purposes can be found in the Twitter Privacy Policy: https://twitter.com/privacy.

C. NOTE REGARDING INSTAGRAM

10.7 We run the Instagram account https://www.instagram.com/finprosofficial/ on the social network Instagram, which is part of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland (hereinafter referred to as "Instagram").

10.8 If you visit our account, data will be collected from Instagram and processed in the US, if necessary. This also happens if you yourself are not a registered user of Instagram or have not logged in to your Instagram account.

10.9 We have no influence on the processing of the collected data, as it is performed solely by Instagram. According to information provided by Instagram, the data collected includes, among other things, the IP address, operating system information, hardware versions and browser type, data collected from Instagram cookies about your user behavior, and other technical data. Please refer to the Instagram Privacy Policy, which you can access here: https://help.instagram.com/519522125107875?helpref=page_content.

D. NOTE REGARDING YOUTUBE

10.10 We operate the following YouTube Channel on the YouTube video platform: https://www.youtube.com/channel/UCTOjXmYH3G3PxC-zVGx4nqw, which is part of YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066 USA (hereinafter referred to as "**YouTube**").

10.11 If you visit our channel, data will be collected from YouTube and processed in the US, if necessary. This also happens if you yourself are not a registered user of YouTube or have not logged in to your YouTube account.

10.12 We have no influence on the processing of the collected data, as it is performed solely by YouTube. According to information provided by YouTube, the data collected includes, among other things, the IP address, operating system information, hardware versions and

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browser type, data collected from YouTube cookies about your user behavior, and other technical data.

10.13 Please refer to the YouTube Privacy Policy, which you can access here: https://policies.google.com/privacy.

E. NOTE REGARDING LINKEDIN

10.14 We run the LinkedIn account https://www.linkedin.com/company/finproscom on the social network LinkedIn, which is operated by LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA (hereinafter referred to as "LinkedIn").

10.15 If you visit our account, data will be collected by LinkedIn and processed in EU and in the US, if necessary. This also happens if you yourself are not a registered user of LinkedIn or have not logged in to your LinkedIn account.

10.16 We have no influence on the processing of the collected data, as it is performed solely by LinkedIn. According to information provided by LinkedIn, the data collected includes, among other things, log-ins, cookies, device information and internet protocol ("IP") addresses to identify you and log your user behavior, and other technical data. Please refer to the LinkedIn Privacy Policy, which you can access here: https://www.linkedin.com/legal/privacy-policy and to the LinkedIn Cookie Policy, which you can access here: https://www.linkedin.com/legal/cookie-policy.

F. NOTE REGARDING VKONTAKTE

10.17 We operate the VKontakte account this one then https://vk.com/public205533298 on the social network VKontakte, which is operated by LLC "VKontakte" of 1-N, bld. 12-14, Lit. A, Khersonskaya St., St. Petersburg, Russia, 191024, which is represented for the purposes of this privacy matters and data protection by MGL MY.COM (Cyprus) Limited of 28 Oktovriou, 365 Vashiotis Seafront, office 402 Neapoli, 3107, Limassol, Cyprus (hereinafter referred to as "**VKontakte**").

10.18 If you visit our page, VKontakte collects data and processes it in the in EU and in Russia, if necessary. This also happens if you yourself are not a registered user of VKontakte or simply have not logged in to your VKontakte account. According to information provided

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by VKontakte, the data collected includes, among other things, the IP address, operating system information, hardware versions and browser type, data collected from Facebook cookies about your user behavior, and other technical data.

10.19 We have no influence on the processing of the collected data, as it is performed solely by VKontakte. Please refer to the VKontakte Privacy Policy, which you can access here: https://vk.com/privacy, the VKontakte data management rules, which you can access here: https://vk.com/data_protection?section=rules, and to the VKontakte Cookie Policy, which you can access here: https://vk.com/privacy/cookies.

11. PAYMENT PROCESSING

11.1. Depending on the chosen payment method, the payment processing for orders may take place through the involvement of Payment Service Providers ("**PSPs**") a service provider. Payment Initiation Service Providers ("**PISPs**") in the case of open banking.

11.2. When paying by credit card, your necessary data such as name, address and the purchase data will be forwarded to the respective credit card company.

11.3. If you pay via PayPal, you will be redirected to PayPal's website via a link. Your personal data will be processed. This data relates to your name, your address, your e-mail address, any telephone numbers and account or credit card information. Please refer to the General Terms and Conditions, Terms of Use and Privacy Policy of PayPal (Europe) S.à.r.l. et Cie, SCA, 22-24 Boulevard Royal, L-2449 Luxembourg on the website: http://www.paypal.com/.

11.4. The legal basis for the payment processing is Art. (6)(1)(b) GDPR. The processing of your personal data is required to fulfil the contract with you.

11.5. The data will be stored by us for as long as necessary to fulfil the contract. In addition, we store this data for the fulfilment of post-contractual obligations and due to commercial and tax retention periods for the statutory period. This retention period is usually 5 years at the end of the respective calendar year.

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12. RECORDING OF TELEPHONE CONVERSATIONS, ELECTRONIC COMMUNICATIONS, INTERNET CONVERSATIONS (LIVE CHATS), AND MEETINGS

12.1. 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.

12.2. 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.

12.3. 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 connection with any dispute, which may arise between you and us.

12.4. 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.

12.5. 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.

12.6. 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.

13. JOB APPLICATIONS

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13.1. If you apply via the FinPros application portal or form or otherwise for a position with us and send us application documents, we will process the personal data you provide in this context only for the purpose of the application process.

13.2. Insofar as you have applied for an advertised position, the documents will be automatically deleted twelve (12) months after completion of the application procedure, provided deletion does not conflict with our legitimate interests. In the case of an application without reference to an advertised position (unsolicited application), the application will be kept for a maximum period of one (1) year in order to contact you, if necessary, with regard to a vacancy that arises during this time. You have the option of requesting the deletion of your application at any time prior to expiry of the scheduled retention periods. In the case of a successful application, the data provided to us will be stored in your employee file in compliance with the legal requirements.

13.3. If you have applied for a position with a related company that is part of the FinPros Group, we will forward your application to the respective company for the purpose of deciding on the establishment of an employment relationship.

13.4. As far as we process your data for the decision on the establishment of an employment relationship, the legal basis the performance of our employment contract with you and our legitimate interests of managing our relationship with you (where the processing activities are not strictly speaking necessary for the performance of a contract.

13.5. In all other instances, the legal basis for storing your application data is your consent in accordance with Art. 6(1) lit. (a) GDPR.

14. WHERE WE KEEP YOUR PERSONAL DATA

14.1. All your Personal Data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on specially protected servers maintained by the Company or its contractors, which are located either in the United Kingdom and/or in the European Union. All processing operations are carried out pursuant to the European General Data Protection Regulation (the "GDPR") (EU) 2016/679.

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14.2. All our contractors are bound by specific contractual clauses for any processing operations of your data on our behalf, and by the confidentiality obligations deriving from the GDPR.

14.3. To protect your Personal Data, we have put in place a number of technical and organizational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorized access, taking into consideration the risk presented by the processing and the nature of the Personal Data being processed.

14.4. Your Personal Data is encrypted and transmitted over the Internet. We use SSL encryption (Secure Socket Layer) for data transmission.

14.5. Organizational measures include restricting access to the Personal Data solely to authorized persons with a legitimate need to know for the purposes of this processing operation.

15. DISCLOSURES OF YOUR PERSONAL DATA

15.1. 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 will check whether this is required or permitted by applicable laws, rules and/or regulations, and will put in place specific contractual clauses for any processing operations of your data on our behalf, and by the confidentiality obligations deriving from the GDPR.

15.2. We require all third parties to respect the security of your Personal Data and to treat it in accordance with applicable laws, rules and/or regulations. 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 and applicable laws, rules and/or regulations.

15.3. We may also share your information, including your Personal Data, with our affiliates and other third parties, such as companies with whom we have marketing or other relationships, for direct marketing purposes ("**Related Parties**") In addition, we may share

the information we have collected about you, including Personal Data, as disclosed at the time you provide your information and as described in this Privacy Policy.

15.4. Examples of when Related Parties may share your information, include the following:

A. Other Community Members

15.5. Certain features of our Site(s) and Services may allow you to share comments publicly with other users. Any information that you submit through such features is not confidential and can be used by us for any purpose. In addition, when you use our Site or the Services, we may share certain Personal Data (such as your name, photo, contact information, or other information you have made visible in the App or Site) to other users of the App or Site in order to facilitate contact among residents and/or between residents and our representatives.

15.6. Note that other users are not bound by our Privacy Policy. You agree that we are not responsible for the actions of other users with respect to any Personal Data disclosed in the App or Site. It is important that you review the applicable Privacy Policy for the event, sponsoring organization, property or Location before providing your information in connection with that event. We request that you treat all Personal Data received about other Users with the same respect and care you would want for your own information.

B. Third Parties Providing Services to us

15.7. We may use Third-Party Service providers to perform certain services on behalf of us or the Site(s) or Services, such as: (i) creating and updating Site(s) and app functionality; (ii) billing or processing credit cards, and/or electronic or manual payments; (iii) assisting us in Site(s) and app operations; (iv) managing a database of customer and consumer information; (v) hosting the Site(s); (vi) designing and/or operating the Site's features; (vii) tracking the Site's activities and analytics, including marketing and market research; (viii) data enhancement (to learn more about our customers); (ix) enabling us to send you special offers or perform other administrative services, such as customer service, security, tech, operational support, email and legal services; and (x) other services designed to assist us in maximizing our business potential. We may provide these Third-Party Service pro with access to user information to carry out the services they are

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performing for you or for us. Those vendors may have additional or different privacy policies and/or Terms of Service. You should be sure that you read and agree to those policies and Terms.

C. To Protect the Rights of Related and Others

15.8. To the fullest extent permitted by applicable law, we may also disclose your information when required to by law or if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend our own rights, safety or property and the rights, safety or property of Related Parties, their affiliates, third parties or the general public (including through the enforcement of this Privacy Policy, our Website terms of Access and Use, and any other applicable agreements and policies); (ii) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders); or (iii) to respond to claims that any content violates the rights of a third party. This includes exchanging information with other companies and organizations for fraud prevention, spam/malware protection, and other similar purposes. To the fullest extent permitted by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest any requests for such disclosures, all without notice to you.

D. Affiliates and Business Transfer

15.9. We may share your information with our parent company(ies), subsidiaries, and affiliates. As part of this sharing of information with our parent company(ies), subsidiaries and affiliates, this means that once you provide us with information, any one of our related entities may use your information including for marketing purposes, pursuant to the terms of this Privacy Policy. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Site and/or our Services; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including during any due diligence process.

16. CHANGE OF PURPOSE

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16.1 We will only use your Personal Data for the purposes for which we collected them, 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.

16.2 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 applicable laws, rules and/or regulations.

17. INTERNATIONAL TRANSFERS OF PERSONAL DATA

17.1. 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).

17.2. 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.

17.3. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

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18. DATA SECURITY

18.1. 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.

18.2. 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.

19. DATA RETENTION

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

19.1. 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.

19.2. 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.

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

B. ERASURE OF YOUR PERSONAL DATA

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

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19.5. 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.

20. YOUR LEGAL RIGHTS

A. THE VARIOUS RIGHTS YOU HAVE

20.1. 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.

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- **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.

20.2. Any questions about this 'Privacy Policy' can be directed to our Compliance Department: compliance@finpros.com.

20.3. Also, if you wish to exercise any of the rights set out above, please contact our Compliance Department: compliance@finpros.com.

B. NO FEE USUALLY REQUIRED

20.4. 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

20.5. 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).

20.6. 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

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

20.8. 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.

21. RIGHT TO COMPLAIN

21.1. You have the right to complain about the handling of your personal data to a data protection authority.

22. RIGHT OF OBJECTION

22.1. If your personal data are processed on the basis of legitimate interests pursuant to Art. 6(1)(f) GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, provided there are reasons for this arising from your particular situation or if your objection is based on being targeted to marketing purposes. In the latter case, you have a general right of objection, which is implemented by us without any particular situation being specified.

23. REVIEWING THIS POLICY

23.1. We encourage our Clients to review this Privacy Policy periodically, so that you are always aware of what information we collect, how it is used and to whom it may be disclosed.

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