
GDPR PRIVACY POLICY

October 2023

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Emporium Capital K.A Limited

Tel: + 357 22 25 65 82	Mail: 41, Arch. Makarios III Av.,
Fax: + 357 22 26 25 45	Toumazis Makariou Tower,
Web: www.ecgprime.com	1 st Floor, Office 102,
E-mail: info@ecgprime.com	1065 - Nicosia, Cyprus

PRIVACY POLICY

Emporium Capital K.A. Ltd (the “**Company**”) is committed to protecting customers’ privacy. This **Privacy Policy** describes what Personal Data we process and how this information is used and protected in the course of our business with you. Any reference to “us”, “we”, “our” is a reference to the Company.

Throughout this Policy, we aim to assist our clients, potential Clients, employees, partners, persons who access our website as well as other interested parties that may be affected, gain an understanding of:

- How the Company use your personal data,
- When and with whom we share your personal data,
- the measures we have adopted and operate as part of our own GDPR compliance program and practices to safeguard your data,
- your rights.

1. PERSONAL DATA: COLLECTION AND RETENTION

We collect customer data in the normal course of our business. The personal data we collect, and process depends on the purpose, product or service requested and agreed in each case.

Personal Data includes all information collected by us and includes name, address, identification details, postal and business address, mobile phone number, email, profession, bank account details, social insurance number, tax identification number, certificate of clean-criminal record, certificate of non-bankruptcy and other relevant details as well as any other information that may be collected through our website or through customer contact with the Company (e.g. when the Data Subject completes a form for the provision of services by the Company). Personal Data also includes data and information we collect, use or disclose that job applicants-prospective employees provide to us through printed and/or electronic form and/or their CV which may be disclosed to us, as well as other relevant documents and data provided to us by third party seekers or job searches websites, as and when appropriate. For the purposes of this Privacy Policy, the terms “personal data”, “data” and “personal information” are used to refer to any information relating to you that identifies or may identify you, either directly or indirectly, such as your name, contact details, identification data, (identity car/passport number) and authentication data (e.g. your signature).

For corporate clients we are required to collect information such as corporate documents, address, and personal information of shareholders, directors, officers that we deem necessary in order to be compliant with our legal and regulatory requirements.

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We obtain Personal Data information in a number of ways through the use of our services and websites, the account opening applications, sign up forms, website cookies and similar tracking technology built into our website and from information provided in the course of our ongoing relationship with you.

We may also collect information about you from publicly available sources, social media platforms, and other third -party associates.

Job applicants: For job applicants-prospective employees, our applicant’s personal data that we may process are the ones you shall provide us with in order to assess you request, which may include but not be limited to your name and contact information, your previous employment, your education, your skills, as well as any other information included in your resume or cover letter to the Company. In the event you are invited to an interview, we may also collect other information as well as sensitive personal data, provided that this is restricted to that which is strictly necessary for the purpose collected. We may also retain the information we receive from your interviewers. The legal basis upon which your personal data are processed as data subject is the provision of your consent for the evaluation of your job application.

Your information will be shared internally with members of the HR and recruitment team, interviewers involved in the recruitment process and managers in the department with a vacancy.

If your application for employment is unsuccessful, we will hold your data on file for 1 year after the end of the relevant recruitment process. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. During the retention period of 1 year we keep these data secure until their disposal.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

Website Navigation: By accessing our website, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this Policy and how we process any information you disclose to us, including personal data prior to becoming a client. Once you open an account with us you agree that this Policy and any subsequent amendments, will govern how we collect, store, use, share and in any other form process your personal data and your rights during our business relationship and after its termination.

If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These

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recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations and electronic communications with the Company, the portfolio management and the trading desk are recorded in order to meet legal requirements relating to the provision of investment services that relate to the reception and. The Company is also under a record-keeping obligation even if those conversations or communications do not result in the conclusion of such transactions or in the provision of client order services. The purpose of recording is to ensure that the conditions of an order issued by the client and its conformity with the transaction executed by the Company can be demonstrated. The obligation to keep records is designed to strengthen investor protection, improve market surveillance, and create legal certainty in the interests of the client and the Company.

Cookies: We use cookies to store and collect information about your use of our website (means the official Company's website www.ecgprime.com). Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our website.

We also keep records of your trading behavior, including a record of:

- Products you trade with us,
- Historical data about the trades and investments you have made, including the amount invested,
- Your preference for certain types of products and services.

Minors: the Company's website is neither intentionally designed nor directed at minors and we do not knowingly collect or maintain information about minors.

Storing your personal data: Your Personal Data is stored and processed by the Company using appropriate security standards for the protection of Personal Data from loss, misuse, alteration, unauthorized access, or disclosure and/or any other form of unlawful processing.

We shall retain your Personal Data throughout the validity period of the contract / relationship, in order to provide the requested services, handle requests and/or enquiries and perform payments. We may also store your Data for a period of up to ten (10) years after the termination of the contract / relationship.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons.

Data processed for the purposes of legitimate interest (e.g., an action against a customer), which are maintained until the legitimate purpose is completed.

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2. PROCESSING

The Company may process the personal data set out above for any of the following reasons:

- a) to communicate with you,
- b) to deliver our services to you,
- c) for compliance with legal obligations and for safeguarding the Company's legitimate interests,
- d) to examine your application for employment with us,
- e) to respond to queries related to the provisions our services to you,
- f) for the examination and assessment of any complaint raised by you and/or the settlement of a dispute,
- g) you have provided us with your consent.

Sharing of information collected:

The Company may disclose data about you, in the performance of its contractual and statutory obligations or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent.

Recipients of your personal data may be:

- h) the Cyprus Securities and Exchange Commission and/or the Central Bank of Cyprus, the income tax authorities, criminal prosecution authorities, as per the relevant legal requirements,
- i) auditors, legal consultants, operational partners and support services partners for the complete provision of the service to the customer,
- j) customer's authorized representative,
- k) regulatory authorities, competent governmental authorities, and agencies (other than tax authorities), law enforcement agencies, intergovernmental or supranational bodies, and other third parties with the requisite authority to request such information.

In each transmission, the Company takes all necessary steps to safeguard the Confidentiality, Integrity and Availability of its systems and services, e.g., to protect against cybersecurity threats, fraud, etc.

Every measure shall be taken beforehand so that only necessary data shall be transmitted along with the effective requirements for their legitimate and lawful processing. Moreover, the organizations to which the data are being transmitted shall undertake a written commitment that they shall on their part comply with the provisions of the GDPR Regulation. Exempts are those cases in which the communication of the data is affected due to legal or statutory obligation.

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3. MARKETING

The Company will be using personal data when communicating and/or promoting the provision of its services. The Company may undertake the conduct of promotional activities in accordance with your preference and upon your consent, using email messages.

You may choose not to receive or object at any time to the processing of your personal data for any marketing communications and/or promotions by contacting us by phone at +357 22 256582, or by post at 41, Arch. Makarios III Avenue, Toumazis, Makariou Tower, 1st Floor, Office 11, 1065 Nicosia, Cyprus, or by email at info@ecgprime.com.

4. GENERAL CUSTOMERS' RIGHTS ACCORDING TO EUROPEAN REGULATION 2016/679 ("GDPR")

4.1 Right of Access

You have the right to access your data maintained with the Company and you may at any time obtain a copy thereof provided we possess then in electronic form.

4.2. Right to Correction [rectification]

You have the right to access and rectify your personal details. You may at any stage of our relationship check and update your personal data, always presenting the necessary documentation and requesting the rectification or completion of inaccurate information.

4.3. Right to Erasure ("Right to be Forgotten")

You have the right to ask for the erasure of the whole or part of the data that concerns you. We would like to underline however that the Company shall be obliged to erase only those personal data which can be erased as per our data erasure policy.

4.4 Right to Restriction

You hold the right to ask for the processing of your personal data to be restricted only in cases when the accuracy of the data is not accurate, it has been used unlawfully but you do not wish for us to delete it, or when the data is no longer useful to the Company but you want us to keep it for use in possible legal claims or you have asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.

4.5. Data Portability

You have the right to portability, that is to transfer your personal data to another organization in a legible and commonly used form.

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4.6. Right of object

You may at any time raise objections about the processing of your personal data. In case you may make use of this right, the processing shall immediately cease the processing of your personal data, unless the Company can prove the existence of legitimate grounds for the processing which override your interests, rights, and freedoms.

4.7. Right to recall your consent.

You have the right any time to withdraw your consent to the processing of your personal data, without however affecting the lawfulness of processing based on consent before it was withdrawn or revoked by you.

5. INFORMATION SECURITY MEASURES

The Company undertakes to protect Personal Data according to the provisions of the Law 125()/2018, the applicable statutory and regulatory framework, including relevant Directive issued by the Office of the Data Protection Commissioner of the Republic of Cyprus, which are available at the Commissioner's website www.dataprotection.gov.cy.

The Company maintains solid information security measures and procedures to safeguard Personal Data in the Company's possession, in line with our legal obligations.

A comprehensive approach is considered for information security to effectively ensure the Confidentiality, Integrity, and Availability of Personal Data. The Company implements generally acceptable security standards for the protection of Personal Data from loss, misuse, alteration, unauthorized disclosure or access, destruction and/or any other form of unlawful processing. Only authorized Company employees/partner are provided access to Personal Data, who are subject to strict confidentiality requirements.

We further seek to ensure that third parties who support the Company's operations or systems or who are otherwise involved in our personal data processing operation, have and operate necessary technical and organizational measures for protecting the security and privacy of personal data.

6. TRANSERS OUTSIDE THE EU (EUROPEAN UNION) AND/OR THE EEA (EUROPEAN ECONOMIC AREA)

Customers are informed that the associates, partners, contractors of the Company are based within the EU and/or the EEA. These partners are contractually committed to the Company to provide appropriate security safeguards and to maintain the confidentiality of the clients' Personal Data.

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Where Data may be transferred to, and stored at, a destination outside the European Union or the European Economic Area, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Where necessary the Company will conclude contractual clauses in order to safeguard the information transmitted.

7. THE COMPANY'S CONTACT INFORMATION/COMPLAINTS

In order to exercise your rights as above or in the case where you require more information concerning your rights, or for any information on this Privacy Policy you may communicate with the Company by phone at +357 22 256582, or by post at 41, Arch. Makarios III Avenue, Toumazis, Makariou Tower, 1st Floor, Office 11, 1065 Nicosia, Cyprus, or by email at info@ecgprime.com.

The same contact details may be used for any inquiry or complaint.

You have the right to launch a complaint with the Commissioner if you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us.

You may find how to submit a complaint to the Commissioner by visiting their website at www.dataprotection.gov.cy.

Given its scale and the risks associated to personal data processing, the Company has not appointed a Data Protection Officer's ("DPO").

8. DEFINITIONS

8.1 "Controller": means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State Law.

8.2 "Personal Data": means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

8.3 "Processing": means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection,

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retention, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

“Processor”: means a natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Controller.

9.CHANGES TO OUR POLICY

This Policy shall be reviewed at least once a year in order to effect necessary changes imposed by legislation, technological developments or due to the need to adapt to new developments and facts.

It is important that you check the Company’s website for updates on this Policy. Any personal information we hold will be governed by the updated policy at the given time.

Our up-to-date Policy will be posted on our website www.ecgprime.com.

You may also request a copy of the most recent version in printed form by visiting our head offices at 41, Arch. Makarios III Avenue, Toumazis, Makariou Tower, 1st Floor, Office 11, 1065 Nicosia, Cyprus.

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