



# **PRIVACY POLICY**



## Privacy Policy

### PRIVACY POLICY

#### 1. Introduction

This Policy outlines how Notesco Financial Services Limited (the “Company”) collects, maintains, uses and discloses personal information about you.

This Policy applies to existing and potential clients as well as to any visitors of the Company website.

The Company is committed to protecting the privacy of all personal data which it obtains from you, including information obtained during your visits to this website.

#### 2. Collection of Personal Data

The Company will only use your personal data in accordance with worldwide data protection practices. The Company is registered as a Data Controller with the Office of the Commissioner for Personal Data Protection under the Processing of Personal Data (Protection of Individuals) Law 138(I)/2001 as amended (the “Law”) and will process personal data only in accordance with Cyprus data protection legislation, this Privacy Policy and the Trading Terms and Conditions of the Company.

The Company will collect and hold personal data about you when you complete an online application for a live or demo account or other type of form or when participating in any other offer the Company promotes through this website.

The Company collects certain personal data in order that it may meet the needs of its customers through the efficient provision of services. By collecting certain personal data, the Company is able to monitor and improve the services which it offers to its existing and potential customers.

Personal data collected includes but is not limited to:

- Personal details such as name, address, telephone number and/or e-mail address;
- Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
- Identity Verification Documents such as passport and ID, utility bills, and/or bank statements or your company incorporation certificates/details;

The Company may derive information from your use of this website and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions



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conducted, documents downloaded and other websites which may have referred you or to which you link.

### 3. Use of Personal Data

The Company may use your information for any one or more of the following purposes:

- To confirm your identity;
- To maintain your personal profile;
- To assess your suitability to the products and services we provide;
- To provide the services to you that you have requested including processing transactions;
- To provide you with transaction and post transaction related services;
- To inform you of products and/or services that may be of interest to you;
- To keep you updated on the issues that are relevant to your business relationship with us;
- To tailor the website to your needs and interests;
- To analyze impersonalized statistical data to enable us to provide you with better products and/or services;
- To administer your account and monitor its conduct and assess and analyse any credit limit, including, the interest rate, fees and other charges to be applied to the Client's Account;
- To pass your personal data to third parties for marketing purposes without prior written consent.

#### 3.1 Retention of Personal Data

The Company will, as required by Law, retain your Personal Data on record for a period of at least five (5) years, which is calculated after the execution of the transactions or the termination of the business relationship or in case of termination of our business relationship.

#### 3.2 Monitoring and Recording

The Company will, as required by Law, monitor and record any communication you have with us whether in writing, by phone or by electronic mail.

#### 3.3 Consent

You consent to the Company using your personal data for the above-stated purposes.



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### 4. Disclosure of Personal Data

The Company may be required to provide your personal data to the Cyprus Securities and Exchange Commission and other regulatory and government bodies in Cyprus and other countries as may be required by law from time to time.

The Company will disclose your Personal Data, without notice when required to do so by law or in good faith that such action is necessary to: (a) protect our rights and/or comply with any court order or judicial proceedings; (b) avoid any potential fraud; (c) conform to the edicts of the law or comply with a legal process served on the Company or on the Company's website; (d) protect and defend the rights or property of the Company (and Group Companies') websites, and, (e) act in urgent circumstances to protect the personal safety of users of the Company, its websites, or the public.

#### 4.1 The Company may also disclose your personal data to:

- The Company's Introducing Brokers or any other Group Companies ("Processors"), who process data on behalf of the Company and who may only use it for the same purposes as the Company, subject to Clauses 4.2 and 4.3 below.
- Companies it hires to provide limited services on our behalf, including packaging, mailing and delivering purchases, postal mail, etc. The Company will ensure that none of your Personal Data will be disseminated to those companies; the companies will only be subject to the information they need to deliver the service, and they are prohibited from using the information for any other purpose.
- Financial institutions and other similar organizations that it deals with in the course of its corporate activities, or those that are nominated by you;
- external service providers and professional advisers (which may be located overseas) that provide services to the Company;
- any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- any third parties where this is necessary to process a transaction or provide services which you have requested; or
- any authority to whom the Company is required to disclose such information by law.

#### 4.2 Warranties

The Processors shall ensure that:

- a. the Processor's employees are informed of the confidential nature of the Personal Data; and



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- b. it will process the Personal Data in compliance with all applicable laws, enactments, regulations, orders, standards and other similar instruments.

### 4.3 Indemnity

The Processors agree to indemnify and keep indemnified at its own expense the Company against all costs, claims, damages or expenses incurred by the Company or for which the Company may become liable due to any failure by the Processor or its Employees to comply with any of its obligations under this Privacy Policy.

### 4.4 Statistical data

The Company may combine your personally identifiable data with information from other users of this website to create impersonalized statistical data. The Company may provide this statistical data to its business partners or third parties. In no circumstances will you be able to be identified from this statistical data; you will remain anonymous.

## 5. Your Rights

You are not obligated to provide any of the personal data requested by the Company. In the absence of this information, however, the Company may not be able to open an account for you where the information is requested in on an application form, or to provide you with any other services, information or assistance you have sought.

Under the Cyprus data protection legislation, you have (subject to certain exceptions) the following rights:

#### i. Right of Access

You have the right to obtain confirmation from the Company as to whether the Personal Data are being processed or transferred to a third country or to an international organization.

You can request a copy of the Personal Data processed, following a written request via e-mail to the Company at [GDPR\\_Group@Notesco.com](mailto:GDPR_Group@Notesco.com), and the Compliance Officer shall provide the requested Personal Data in electronic format.

#### ii. Right of Rectification

You have the right to rectify any inaccurate Personal Data which the Company may hold, without undue delay. Depending on the purpose of the Processing, you can also have incomplete Personal Data completed. This could involve providing a supplementary statement to the incomplete Personal Data.



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### iii. Right to Erasure

You have the right to request from the Company the erasure of Personal Data which relate to you. Following a written request sent in electronic format, the Company shall be obliged to erase the Personal Data when:

- The Personal Data are no longer necessary for the purpose which they were originally collected or processed for;
- The Company is relying on consent as the lawful basis for holding the Personal Data, and the Data Subject's consent to Processing is withdrawn;
- The Company is relying on legitimate interests as the basis for processing, the Data Subject objects to the Processing of their Personal Data and there is no overriding legitimate interest to continue this Processing;
- The Personal Data have been unlawfully processed;
- The Personal Data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject;
- The Personal Data have been collected in relation to the offer of information society services.

The above shall not apply where the processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
- for the establishment, exercise or defence of legal claims.

### iv. Right to Object

You have the right to object, at any time and on grounds relating to your particular situation, to the processing of your personal data where such processing is based on our legitimate interests or the performance of a task carried out in the public interest.



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In such cases, we will cease processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or where the processing is necessary for the establishment, exercise, or defence of legal claims.

Additionally, you have the absolute right to object at any time to the processing of your personal data for direct marketing purposes, including profiling related to such marketing. If you object to processing for these purposes, your personal data will no longer be processed.

v. Rights to restrict the Processing

You have the right to obtain from the Company the limitation of the Processing of the Personal Data in case any of the following circumstances:

- You contests the accuracy of your Personal Data and these are verified by the Company.
- The Processing of the Personal Data is unlawful and you oppose to the erasure and request restriction instead.
- We no longer need to process the Personal Data, but you need them for the formulation, exercise or defend a legal claim.
- You have objected to the Processing, and it is being investigated whether our legitimate reasons prevail over yours.

vi. Right to data portability

You have the right to have your Personal Data transmitted by the Company to another Data Processor or to you, in a structured, commonly used and machine readable format. The right to data portability is applicable only when:

- The lawful basis for the Processing of the Personal Data is consent or for the performance of a contract; and
- The Processing is carried out by automated means.

## 6. Automated individual decision-making and profiling

The Company does not engage in decision-making based solely on automated processing, including profiling, that produces legal effects or similarly significant impacts on individuals. All decisions involving personal data are reviewed and made with meaningful human involvement to ensure fairness, transparency, and the protection of individuals' rights.



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### 7. International Data Transfers

In certain circumstances, we may transfer your personal data to countries outside the European Economic Area (EEA). Such transfers will only take place where necessary for the performance of our services, compliance with legal obligations, or where we use third-party service providers located outside the EEA.

When we transfer your personal data outside the EEA, we ensure that appropriate safeguards are in place to protect your data in accordance with applicable data protection laws.

You may contact us for more information about the safeguards we implement for such transfers.

### 8. Contact us

You may inform the Company at any time that your personal details have changed or that you wish the Company to delete personal data we hold about you by emailing us at [GDPR\\_Group@Notesco.com](mailto:GDPR_Group@Notesco.com). The Company will change or delete your personal data in accordance with your instructions, except to the extent that we are required to hold your personal data for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

We may charge a fee to cover the associated administrative costs.

If you have any questions, complaints or requests, please write to the Company, verifying your identity and setting out in full what information you require. If a complaint is not resolved by the Company to your satisfaction, you may complain to the Information Commissioner.

### 9. Consent

By accessing this website, you consent to the Company collecting, maintaining, using and disclosing personal data about you and provided by you or by another person as in accordance with this Privacy Policy.

### 10. Links

When you use this website, you may be able to link to other websites. This Privacy Policy does not apply to those other sites. The Company encourages you to read and understand the privacy policies on these other sites.



## Privacy Policy

### 11. Cookies

The Company uses cookies to gather information about your access to our website and other services we provide to you. Please note that this description is not comprehensive and the Company's Cookie Policy contains additional information.

Cookies are small pieces of information which use a unique identification tag and are stored on your device as a result of you using this website or other services we provide to you.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, it is strongly recommended that you allow cookies on our website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of our website and trading platform and may also impair the quality of the services that we provide to you in relation to your account.

### 12. Security

The Company adopts strong measures to protect the security of your Personal Data and to ensure it is not accessed by unauthorised persons. Access to Personal Data is restricted to employees and authorized service providers who need it to perform their work. You must not share or disclose your log in details with any third party.

The Company takes strong precautions to protect your personal data from loss, theft, copying, misuse, unauthorised access or disclosure, alteration, or destruction. Measures include encryption during data transmission, strong authentication mechanisms and separation of machines and data to provide secure areas.

In addition, the Company ensures the security of transmission of your payment card details that are protected using Transport Layer encryption-TLS 1.2 and application layer with algorithm AES and key length 256 bit in accordance with the recommendations of Payment Card Industry Security Standards Council.

### 13. Amendments to policy

The Company reserves the right to make changes this Privacy Policy from time to time for any reason and will notify you of such changes by posting an updated version of this Privacy Policy on this website. You are responsible for regularly reviewing this Privacy Policy and if you use this website after any such changes are published, such use shall constitute your agreement to such changes.

## Privacy Policy

All queries should be emailed to us at [compliance@fxlift.eu](mailto:compliance@fxlift.eu).

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