



General Data Protection Policy

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Table of Contents

1. Grounds for Data Collection	3
2. The Personal Information we collect about you	3
3. Non-Personal Information	4
4. Cookies and Tracking Technologies	4
5. How we use your Personal Information	4
6. Purposes for which we will use your Personal Information	4
7. Marketing Purposes	6
8. Cookies	6
9. With whom do we share your personal information?	6
10. Automated decision-making and profiling	7
11. Recording of telephone conversations and of electronic communication	7
12. How we protect your Personal Information	8
13. Compromise of Personal Information	8
14. Retention	8
15. Your Legal Rights	8
16. Time limit to respond	9
17. Account Closure	9

General Data Protection Regulation

The General Data Protection Regulation (“GDPR”) 679/2016, replaces the 1995 Data Protection Directive (95/46/EC), and it is designed for the protection of natural persons with regards to processing of personal data and on the free movement of such data. It harmonizes data privacy laws across Europe, and it addresses the export of personal data outside the EU with the aim to protect all EU citizens’ data privacy and reshape the way organizations approach data privacy.

1. Grounds for Data Collection

Processing of your personal information (meaning, any data which may potentially allow your identification with reasonable means, hereinafter “Personal Information”) is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure, and other uses of your Personal Information as described in this document.

2. The Personal Information we collect about you

We may collect, use, store and transfer various kinds of personal information about you which we have grouped together as follows:

- **Identity Information** includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.
- **Contact Information** includes billing address, delivery address, email address and telephone numbers.
- **Professional Information** includes level of education, profession employer name, work experience in Forex/CFD’s, information on client’s experience, knowledge in the forex industry and risks.
- **Tax Data** includes country of tax residence and tax identification number.
- **Financial Information** includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, e-wallet information.
- **Transaction Information** includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- **Profile Data** includes your username and password, purchase or order made by you, your interests, preferences, feedback, and survey responses.
- **Usage Information** includes information about how you use our website, products, and services.
- **Marketing and Communication Information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, store, and use the following more sensitive types of personal information:

- Information about criminal convictions and offences.

3. Non-Personal Information

We record and collect data from or about your device (for example your computer or your mobile device when you access our services and visit our site. This includes, but not limited to: your login credentials, UDID, Google Advertising ID, IDFA, cookie identifiers, and may include other identifiers such as your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us.

If we combine Personal information with non-personal information about you, the combined information will be treated as Personal Information for as long as it remains combined.

4. Cookies and Tracking Technologies

When you visit or access our services we use (and authorize third parties to use) pixels, cookies, events and other technologies (“Tracking Technologies”). Those allow us to automatically collect information about you, your device, and your online behaviour, in order to enhance your navigation in our services, improve our site’s performance, perform analytics and customize your experience on it. In addition, we may merge information we may obtain from other sources and, as a result, such information may become Personal Information.

Our Company uses Google Analytics, Google Tag Manager, Google AdWords (Conversion Tracking), Facebook (Conversion Tracking). Technologies such as: cookies, beacons, tags, and scripts are used by our partners, affiliates, analytics, or service providers. We may receive reports based on the use of these technologies by such companies on an individual as well as aggregated basis.

5. How we use your Personal Information

We will only use your Personal Information when the Law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- Where we need to perform the contract we 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. Purposes for which we will use your Personal Information

We have set out below, in a table format, a description of all the ways we plan to use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	a) Identity b) Contact c) Financial d) Professional e) Tax	Performance of a contract with you Compliance with legal obligations

<p>To process and deliver your order including:</p> <ul style="list-style-type: none"> a) Manage payments, fees and charges b) Collect and recover money owed to us 	<ul style="list-style-type: none"> a) Identity b) Contact c) Transaction d) Financial e) Marketing and Communications 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Marketing and Communications 	<ul style="list-style-type: none"> 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)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical 	<ul style="list-style-type: none"> 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 reorganisation or group restructuring exercise) b) Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> a) Technical b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To perform automated decision in order to identify your knowledge and experience in Forex industry and to identify your risk profile (appropriateness and suitability test)</p>	<ul style="list-style-type: none"> a) Identity b) Financial c) Professional 	<p>Necessary to comply with legal obligations</p>

To make suggestions and recommendations to you about our services that may be of interest to you	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile 	Necessary for our legitimate interests (to develop our products/services and grow our business)
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7. Marketing Purposes

We will use your Personal Information (such as your email address or phone number).

Opt-out if you do not want us to use or share your Personal Information for marketing purposes, you may opt-out in accordance with this “Opt-out” section. Please note that even if you opt-out, we may still use and share your personal information with third parties for non-marketing purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc). in such cases, the companies with whom we share your Personal Information are authorized to use your Personal Information only as necessary to provide these non-marketing services.

8. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that you can still access this website and it will function properly. Cookies are used on this website in order to offer our users a more customized browsing experience.

9. With whom do we share your personal information?

- **Internal concerned parties** - we share your information with companies in our group, as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services.
- **Financial providers and payment processors** - we share your financial information about you for purposes of accepting deposits or performing risk analysis.
- **Business partners** - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- **Legal and regulatory entities** - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement, take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of the Company, its users and/or partners. We may also disclose your personal information where requested by our supervisor or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker.
- **Merger and acquisitions** – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

International Transfers of Personal Information

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

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.

10. Automated decision-making and profiling

In order to perform the contract between us and as authorized by the relevant regulations [Directive 2014/65/EU MIFID, Law 87(i)/2017 and Circular 168 and 028 of Cyprus Securities and Exchange Commission] it is requested for the provision of the investment services to you and once per calendar year thereafter, to assess your knowledge and experience, your financial situation and investment objectives and your risk profile. We fulfil the above requirements through the following tools:

Appropriateness Test: it takes place when you require to register as client of Leverate Financial Services Ltd. Hence, we need to check and ensure that you are suitable for the provision of Leverate's Financial Services Ltd services and products by taking an appropriateness test in regard to your knowledge, financial background and experience in regard to financial services. Based on the scoring you receive; you will be informed whether you are eligible to receive our services and become our Client and the maximum level of leverage you are eligible to. The reason for assessing your appropriateness is to enable Leverate Financial Services Ltd to offer to you services suitable to you and act in the client's best interest.

Suitability Test: it takes place when you request to be offered our investment program. In this respect you will be required to take a suitability test in order to assess your financial situation, risk profile and risk tolerance as an investor and that the investment program is suitable for you. Based on your scoring, we will be able to assess your investment objectives, if you are able financially to bear any related investment risks consistent with your investment objectives. The reason for assessing your suitability is to enable Leverate Financial Services Ltd to act in the client's best interest. The scorings above are monitored by the Compliance department of Leverate Financial Services Ltd and you may see your results and an explanation of the scoring or to challenge the decision by sending an email to compliance@leverate.com. During these processes, Leverate Financial Services Ltd takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure personal data of the client.

11. Recording of telephone conversations and of electronic communication

We record, monitor, and process any telephone conversations and/or electronic communications between us such as through fax, email, social media, electronic messages, either initiated from the Company's side or your side. All such communications are recorded and/or monitored and/or processed by Leverate Financial Services Ltd, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. Any such records shall be provided to you upon request at the same language as the one used to provide investment services to you.

12. How we protect your Personal Information

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Information. Your information is stored on secure servers and it is not publicly available. We limit access of your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us.

Leverate Financial Services Ltd is concerned with protecting your privacy and data, but we cannot ensure or warrant the security of any information you transmit to Leverate Financial Services Ltd or guarantee that your information on the Leverate Financial Services Ltd Service may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards. When you enter sensitive information (such as personal name, phone and/or email) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL). No method of transmission over the Internet or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. We use an outside help platform, some trading services and a credit card processing company to bill you.

13. Compromise of Personal Information

In the event that personal information is compromised as a breach of security, Leverate Financial Services Ltd will promptly notify our customers in compliance with applicable law. Retention We will retain your personal information for as long as necessary to provide our services and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

14. Retention

We will retain your personal information for as long as necessary to provide our services and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

15. Your Legal Rights

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **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 impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request the 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.
- **Right to withdraw** consent 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.

16. Time limit to respond

We try to respond to all legitimate requests within one month. 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.

17. Account Closure

If you terminate your account, please be aware that Personal Information that you have provided us may still be maintained for legal and regulatory reasons (as described above), but it will no longer be accessible via your account.

If you wish to exercise any of the GDPR rights set out above, please send an email to dpo@leverate.com.

Updates to this Policy

This Policy is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website. You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to bound by the updated Policy.