CTS Cloud Trading Solutions Ltd

PRIVACY POLICY

1. Introduction

CTS Cloud Trading Solutions Ltd (the "Company" or "CTS") is a Cyprus Investment Firm authorised and regulated by the Cyprus Securities & Exchange Commission (the "CySEC"), under License No.: 224/14. The Company's registered business address is 75 Athalassas Avenue, Nicosia 2012, Cyprus.

In relation to the requirements deriving from Regulation (EU) 2016/679, the General Data Protection Regulation (the "GDPR"), and the Cyprus Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data, Law 125(I)/2018, as amended, the Company is required to provide information regarding the processing of personal data.

This Privacy Policy (the "Policy") explains how the Company collects, uses, stores, shares and protects personal data relating to its clients, prospective clients and website users. Where applicable, it also covers personal data relating to directors, authorised representatives and beneficial owners of legal entities with which the Company has a relationship.

The Company acts as the Data Controller in relation to personal data processed for the purposes described in this Policy.

2. Processing of your Personal Data

The Company acts as Controller of the personal data it processes. Depending on your relationship and interaction with the Company, the personal data processed may include, inter alia:

- Personal identifiers, such as name, date of birth, nationality and identification details;
- Contact details, including residential address, telephone number and email address;

- Identification and due diligence information, including copies of passports, identity cards, proof of address, tax residency and tax identification information and, where required, information concerning occupation, employment, source of funds or source of wealth;
- Financial information, including bank and payment details, account information, deposits and withdrawals, financial situation and other information required for the provision of investment services;
- Investment objectives, knowledge and experience and other information used for client classification and appropriateness assessments;
- Trading, transaction and order information, including information generated through the Company's trading platform and relating to the operation of the client's trading account;
- Residential location data, online IP addresses, device, login and other technical information;
- Website user statistics and other analytics and, where applicable, information collected through cookies and similar technologies;
- Correspondence and communications with the Company, including emails, chats, customer-support communications, complaints and telephone or electronic communications that the Company is required to record under applicable legislation; and
- Any other information which the Company is required to collect or maintain in order to comply with its legal and regulatory obligations.

The Company does not collect personal data which is not reasonably necessary for the purposes for which it is processed.

3. How we get your Personal Data

Most of the personal information we process is provided to us directly by you, including when you request to open a trading account, complete the Company's onboarding procedures, communicate with the Company or use its services.

The Company may also obtain or generate personal data:

- through your use of the Company's website, mobile application, trading platform and services;
- from identity-verification, screening, fraud-prevention, payment or other service providers used by the Company, where applicable;
- from banks and payment service providers in connection with deposits, withdrawals or other account activity;
- from public registers, sanctions lists, PEP databases and other publicly or lawfully available sources where necessary for compliance purposes; and
- from competent authorities or other third parties where permitted or required by law.

We will use the information that you have given us to assess your request for opening a trading account and to provide the services requested, in accordance with the applicable EU and Cyprus regulatory framework.

We may share information internally across the Company's departments responsible for different aspects of the client relationship, on a need-to-know basis and where required for the performance of their functions.

4. Why we process your Personal Data

Under the GDPR, the lawful bases on which the Company may process personal data include the following:

- Performance of a contract or steps prior to entering into a contract, including processing required to assess an application, open and administer a trading account and provide the investment and ancillary services requested by the client;

- Legal obligation, including processing required under the applicable investment-services legislation, MiFID II, Law 87(I)/2017, AML/CFT legislation, tax legislation and other legal or regulatory requirements applicable to the Company;
- Legitimate interests, where necessary for the Company's legitimate business interests and where those interests are not overridden by the rights and interests of the individual, including for information and system security, fraud prevention, internal administration, monitoring of the Company's services, establishment or defence of legal claims and improvement of the Company's operations; and
- Consent, where processing is based on consent and applicable law requires or permits that basis, for example for certain marketing or non-essential electronic communications or technologies, where applicable. Consent may be withdrawn at any time without affecting processing already lawfully carried out before withdrawal.

The Company processes personal data, as applicable, for the following purposes:

a) Opening, verifying, administering and maintaining client accounts;

b) Assessing client classification, knowledge and experience and appropriateness in accordance with applicable investment-services requirements;

c) Providing investment and ancillary services, processing instructions and transactions and administering the client relationship;

d) Performing identity verification, customer due diligence, sanctions and PEP screening, transaction monitoring, fraud prevention and other AML/CFT controls;

e) Complying with regulatory, transaction, tax, accounting, audit, recordkeeping and reporting obligations;

f) Managing complaints, requests, disputes and customer-support matters;

g) Monitoring and protecting the security and integrity of the Company's systems, website, trading infrastructure and client accounts;

h) Establishing, exercising or defending legal claims and protecting the Company's legitimate rights and interests; and

i) Where applicable, communicating information concerning the Company's services and managing website analytics and marketing preferences.

5. Sharing and Transfer of your Personal Data

During the course of its business, the Company may disclose personal data where necessary to:

- third-party service providers supporting the Company's operations, including, where applicable, information technology, hosting or cloud providers, identity-verification and screening providers, payment service providers, banks, communications providers and other operational service providers;
- auditors, consultants, legal advisors and other professional advisers;
- CySEC, the Tax Department, MOKAS, law-enforcement bodies, courts and other competent authorities where disclosure is required or permitted by applicable law; and
- other parties where disclosure is necessary for the establishment, exercise or defence of legal claims or otherwise required by law.

6. How we Store and Retain your Personal Data

Your information is securely stored using appropriate information and data-protection security mechanisms.

The Company maintains appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, taking into account the nature of the information processed and the relevant risks.

We keep your personal data and information for a period of five (5) years from the end of our business relationship and, if requested by the competent authorities, for a period of up to seven (7) years.

7. Your Data Protection Rights

Under the GDPR, and subject to the conditions and exceptions provided by applicable law, your data-protection rights include:

- Your right of access: You have the right to ask us whether we process your personal data and to request access to and a copy of such information;
- Your right to rectification: You have the right to ask us to rectify personal information which is inaccurate and to complete information which is incomplete;
- Your right to erasure: You have the right to ask us to erase your personal information in certain circumstances;
- Your right to restriction of processing: You have the right to ask us to restrict the processing of your personal information in certain circumstances;
- Your right to object to processing: You have the right to object to certain processing, including processing based on legitimate interests, subject to the conditions set out in the GDPR;
- Your right to data portability: You have the right, where the applicable GDPR conditions are met, to receive personal information you have provided to us in a structured, commonly used and machine-readable format and to request its transfer to another controller where technically feasible;
- Your right to withdraw consent: Where processing is based on consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal; and

The Company may be required to continue processing or retaining certain information notwithstanding an erasure, restriction or objection request where the processing is

necessary to comply with a legal or regulatory obligation or for the establishment, exercise or defence of legal claims.

You are generally not required to pay a charge for exercising your rights. However, the Company may charge a reasonable fee or, where permitted by the GDPR, refuse to act where a request is manifestly unfounded or excessive, particularly because of its repetitive character.

If you make a request, the Company will respond without undue delay depending on the request.

Please contact us at compliance@cloud-trading.eu if you wish to exercise any of your rights or have a question concerning the processing of your personal data.

8. How to Complain

If you have any concerns about our use of your personal information, you may make a complaint to the Company at compliance@cloud-trading.eu.

You also have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection of Cyprus if you consider that the processing of your personal data infringes applicable data-protection legislation.

11. Amendments to this Policy

The Company may amend or update this Policy from time to time to reflect changes in applicable legislation, regulatory requirements, technology, its processing activities or its business operations.

The latest version of this Policy shall be made available on the Company's website. In the event of any material changes affecting the way the Company processes clients' personal data, the Company shall notify affected clients via email or another appropriate durable medium.