



Klips

Klips CY LTD – Privacy Policy

1. Introduction

- 1.1. KLIPS CY Ltd (the “Company”, “Klips CY”, “we” and “our”) a limited liability Company incorporated in the Republic of Cyprus with registration number HE431041. Klips CY is authorized and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (“CIF”) with license number **434/23** and having its registered address at 116 Gladstonos Street, M.Kyprianou House 3rd & 4th floor, 3032, Limassol, Cyprus.
- 1.2. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below and in accordance to applicable data protection legislation (including but not limited to the General Protection Regulation (EU) 2016/679 (the “**GDPR**” and the Cyprus Law 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)(the “**Data Processing Law**”). For the purpose of GDPR and the Data Processing Law, Klips CY is the data controller
- 1.3. At KLIPS, we acknowledge that confidentiality and security of your personal data is of utmost importance to you hence we have developed specific policies and practices designed to protect your personal data. Protection of your personal data requires, among other things , the establishment by KLIPS of appropriate technical and organizational measures as a means to ensure a high level of data protection.

2. What personal data do we collect and process?

- 2.1. The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company may ask clients in certain circumstances, to gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively.
- 2.2. The Company may collect customer’s credit card data where is necessary to offer the services the customer opted for. In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details – are protected using Transport Layer encryption – TLS 1.2 and application layer with algorithm AES and key length 256 bit.
- 2.3. The information the Company collects includes information required to communicate with and identify its clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.
- 2.4. The Company also collects Non-Personal Information, meaning the information which does not allow us to identify the end-user. The other type of information that we collect is the Personal Information and this allows us to identify the end-user:
 - full name, residential address and contact details (e.g., email address, telephone number, fax etc.);
 - date of birth, place of birth, gender, citizenship;
 - information about your income and wealth, including details about your source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;
 - trading account balances, trading activity, your inquiries and our responses;
 - information on whether you hold a prominent public function (PEPs);
 - profession and employment details;
 - authentication data (e.g., signature);

- location data;
 - trading performance, knowledge and experience;
 - verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us); furthermore, we may collect other identifiable information such as identification numbers and/or Passport/Tax registration numbers;
 - any other information customarily used to identify you and about your trading experience which is relevant to us providing our services to you;
 - activity and movement on the website.
 - Device data- this is the information that we collect from your device and that includes your IP address, unique identifiers and other information that relates to your activity while using the services of the Company.
- 2.5. We obtain this information in a number of ways through your use of our services including through any of our websites, apps, the account opening applications, our demo sign up forms, webinar sign up forms, subscribing to news updates and from information provided in the course of ongoing customer service communications. We may also collect this information about you from third parties such as through publicly available sources. We also keep records of your trading behaviour, including records regarding the following:
- products you trade with us and their performance;
 - historical data about the trades and investments you have made including the amount invested;
 - your preference for certain types of products and services.
- 2.6. We may ask for other personal information voluntarily from time to time (for example, through market research or surveys).
- 2.7. 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.
- 2.8. 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 business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice. Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

Unsolicited Personal Information

- 2.9. Where we receive personal information about an individual which is unsolicited by us and not required for the provision of our services, we will securely destroy the information (provided it is lawful and reasonable for us to do so).
- 2.10. 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 as per the requirements of the Cyprus Securities Exchange Commission (the "CySEC") and/or the compliance obligations of the Company. These recordings will be Company's sole property and will constitute evidence of the communications between the Company and you. Such telephone conversations may only be recorded with the use of a warning tone or with any other further notice with which the Company will notify you about the legal reason it has for such processing and will further ask for your consent.

3. How do we collect your personal data?

3.1. We use different methods for collecting your personal data such as:

3.1.1. Direct interactions. You may give us your identity, contact and financial data by filling in the required registration forms in our website, Electronic Services or by corresponding with us by phone, email or otherwise. This includes, but is not limited to, personal data you provide us when you:

- apply for our products or services;
- make a request in terms of the client agreement;
- create an account on our website, through Electronic Services or use of any of KLIPS applications;
- provide as a result of transactions you conduct through KLIPS systems or in connection with services offered by KLIPS;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us feedback

3.1.2. Automated technologies or interactions. As you interact with our Electronic Services, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Cookies do not identify the individual – they simply allow us to track usage patterns so that we can measure the level of interest in various areas of its site. All browsers allow individuals to be notified when they receive a cookie and elect whether to accept it.

3.1.3. The Company uses cookies to secure clients' trading activities and to enhance the performance of the fxvc.eu website. Cookies used by the Company do not contain personal information or other sensitive information. The cookies used by the company are:

- "**persistent cookies**"- only read by our website, are stored on your device for a fixed time period and are not deleted when the browser is closed. We use these cookies to know who you are for your next visits allowing us to know your preferences the next time you log-in.
- "**session cookies**"- these are only stored while the browsing session lasts enabling the normal use of the system and are deleted when the browser is closed.

3.1.4. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical data from analytics providers such as Google;
- Contact, financial and transaction data from payment services providers;
- Identity and contact data for KYC purposes from individual and publicly availability sources, such as the registrar of companies, WorldCheck, GB Group, Thomson Reuters, any consumer-reporting agencies etc.

3.1.5. Please note that you may remove the cookies following your browser settings however, disabling of cookies may limit your online experience as well as the functionality of some of the features for the services we provide may be low.

3.1.6. The Company may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the fxvc.eu website, the Company may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

- 3.1.7. We also process personal data generated by us in the course of providing you with our services such as Transaction Data.
- 3.2. The Company uses clients' personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients provided that the clients' have consented to the usage of this data for such purposes.
- 3.3. It shall be noted that the Company may anonymize or de-identify the collected information which, on its own, cannot personally identify you. In addition, the combination of Personal and non-Personal information is considered as Personal information and will be treated so while remaining combined.
- 3.4. The clients' personal data will be kept to the Company's records during our contractual relationship with the Client and after the termination of our contractual relationship, for 5 (five) years as per the requirements of CySEC and 7 (seven) years for taxation purposes in order to be able to provide to you the best of our services but also to comply with our legal obligations.

4. For what purposes will we use your personal data?

We may use your personal data for the following purposes ("Permitted Purposes"), based on the following legal grounds:

- 4.1. To enter into or perform our agreement
- 4.1.1. To provide services to you in accordance with the agreement(s) you or your organization may have with us, for record-keeping and compliance procedures;
- 4.1.2. To provide you or your organization with brokerage and other services available on our platforms and/or to deal with any requests or inquiries you may have;
- 4.1.3. To respond to requests for information from you and to follow up afterwards to see if any further assistance is required.
- 4.2. To comply with our Legal Obligations
- 4.2.1. To comply with any applicable laws in any country we operate in;
- 4.2.2. For the purposes of preventing and detecting money-laundering, terrorism, fraud or other crimes and/or abuses of our services;
- 4.2.3. To comply with any legal, regulatory or good practice requirements and to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue services from time to time.
- 4.3. To pursue our legitimate interests
- 4.3.1. For our own administrative and operational procedures;
- 4.3.2. For statistical purposes and for market research and product analysis and to develop and improve our products and services;

4.3.3. To carry out, monitor and analyze our business or operations including the activities set out in this Privacy Policy;

4.3.4. To enforce or apply any agreement and/or to protect our (or others') property or rights and to defend any potential claim;

4.4. For marketing purposes with your consent

We may also process your personal data for the following purposes (after obtaining your express consent where such is legally required) in accordance with your preferences:

4.4.1. To communicate with you through the channels you have approved so as to keep you up to date on latest developments, announcements and other information about KLIPS services, products and technologies;

4.4.2. To conduct client surveys, marketing campaigns, market analysis or promotional activities;

4.4.3. To collect information about your preferences, to create a user profile to personalize and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

4.4.4. To conduct monitoring by us or any other person on our behalf using various methods, including:

- (i) the use of "intelligent" automated monitoring tools; or
- (ii) through random monitoring of systems, for example systematically via electronic communication recording tools;
- (iii) specific monitoring of systems for example in relation to investigations, regulatory requests, subject access requests, litigation, arbitration or mediation or;
- (iv) data tracking, aggregation and analysis tools that pull data from various disparate data sources to draw linkages and/or detect behavioral patterns, interactions or preferences for analysis (including predictive analysis); and/or
- (v) using other similar monitoring technology that may become available from time to time.

4.5. Where legally required, we will not use your Personal Information for taking any automated decisions affecting you or creating profiles other than described above.

4.6. We will use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that such reason is compatible with the original purpose and the law (in which case your knowledge or consent for use thereof is not required). If you wish to get an explanation as to how compatibility of the reason and the original purpose is determined, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you accordingly and explain the legal basis which allows us to

5. Who we share your Personal information with and in what circumstances?

We may share your Personal Information in the following circumstances:

5.1. We may share your Personal Information between KLIPS Entities on a confidential basis as allowed by applicable law or where required for the purpose of providing products or services and for administrative, billing and other business or ancillary purposes.

5.2. We may instruct service providers in or outside KLIPS, domestically or abroad, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions.

KLIPS requires these service providers to enter into relevant agreements with KLIPS as such may be required by applicable laws that govern the use of any information that they receive from us. These agreements prohibit the service provider from using information of KLIPS clients other than for the purposes for which they were provided or disclosed. In accordance with applicable legislation, KLIPS will retain control over, remain responsible for your personal data and use appropriate safeguards to ensure integrity and security of your Personal Information when engaging service providers.

- 5.3. We may share your personal data with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies.
- 5.4. We may share your personal data with companies providing services in the areas of IT, trading platforms administration, translation of documents, support of clients, marketing, promoting our services and products, external and internal audit, cloud storage, payment services and banks.
- 5.5. We may share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets or of KLIPS Entities; additionally, we may seek to acquire other businesses or merge with them.
- 5.6. We may disclose information about you to any depository, stock exchange, clearing or settlement system, account controller or other participant in the relevant system, to counterparties, dealers, custodians, intermediaries and others where disclosure is reasonably intended for the purpose of effecting, managing or reporting transactions in connection with the provision of our services or establishing a relationship with a view to such transactions.
- 5.7. Consistent with applicable law, we may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of an alternative dispute resolution process.
- 5.8. Generally, we will only disclose your Personal Information when you direct us or authorize us to do so, when we are allowed or required by applicable law or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.
- 5.9. The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy and Data Protection Policy.
- 5.10. The Company reserves the right to disclose personal information to third parties where such disclosure is required by the Law and/or regulatory or any other government authority. The Company may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to its clients.
- 5.11. As part of using your personal information for the purposes set out above, non-affiliated third parties are:
 - (i) service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization, financial, regulatory, compliance, insurance, research and/or other services,
 - (ii) payment service providers and banks processing your transactions;
 - (iii) auditors or contractors or other auditing advisors assisting with or advising on any of our business purposes.

6. Transfers outside of the European Economic Area (EEA)

- 6.1. We may transfer your personal information inside or outside the European Economic Area to other KLIPS Entities as well as service providers. To the extent we transfer your information outside the EEA, we will ensure that the transfer is lawful and that the service providers in third countries are obligated to comply with the European Data Protection Laws or other countries laws which are comparable and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.
- 6.2. If we make transfers to processors in the USA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, or any other equivalent applicable safeguarding arrangements.
- 6.3. Your personal information may be processed by staff in the Klips Group operating inside or outside the EEA who are working for us or another Klips Entity or for one of our service providers. Such staff may be, among others, engaged in the fulfilment of your requests, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, processing and storing. The Company will take all steps reasonable necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

7. Security and protection

- 7.1. KLIPS has put in place appropriate security measures to protect the security of its clients' personal data and prevent any unauthorized or unlawful processing, accidental loss, destruction, alteration, disclosure or damage of clients' personal data. KLIPS implements appropriate technical and organizational measures such as network traffic encryption, pseudonymization, data encryption, two-factor authentication, access management procedure, tokenization, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy etc. KLIPS limits access to the clients' personal data to those employees, agents, contractors and other third parties who have a business need to know, only process clients' personal data on KLIPS instructions and are subject to a duty of confidentiality.

8. Recording of electronic communications

- 8.1. We record, monitor and process any electronic communications between us through fax, email, social media, electronic messages, either initiated from KLIPS or you. All communications are recorded and/or monitored and/or processed by KLIPS, including any 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 any arrangements and or transactions. The content of any in communications with you may be recorded by minutes or notes. Any such records can be provided to you upon request at the same language as the one used to provide services to you.

9. How long will you use my personal data for?

- 9.1. The clients' personal data will be kept to the Company's records during our contractual relationship with the Client and after the termination of our contractual relationship, for 5 (five)

years as per the requirements of CySEC and 7 (seven) years for taxation purposes in order to be able to provide to you the best of our services but also to comply with our legal obligations.

10. Your legal rights

- 10.1. The Company uses all possible means to respect and protect its clients' privacy. At any time, the client may contact the Company and request:
- a. **Right to access**, request copy, correct or delete any Personal Information that the Company collected, and which was subject to processing but also the ways with which this data was obtained, the reason for processing, what data categories were processed and the basis of the automated processing system.
 - b. **Right to restrict processing**: You have the right to request the restriction or suppression of your personal data. The Company for the purpose of complying with the applicable Laws and Regulations, as described above, may store the personal data for a certain time period but will not use it.
 - c. **Right to object**: You have the right to object to the processing of your personal data. The Company may be able to continue processing to comply with Laws and Regulations.
 - d. **Right to withdraw consent**: Where we have obtained your consent to process your personal data you may withdraw this consent at any time. In this case, the Company will be forced to terminate its relationship with you within 10 days.
 - e. **Right of erasure**: You have the right to request erasure of your personal data. It shall be noted that the Company may refuse to satisfy your request as under any other legal obligations that the Company is subject to, we may be required to keep the information that you provide to us.
 - f. **Right for data portability** allows you to obtain and reuse your personal data for your own purposes across different services. The Company shall provide such information to you free of charge however, in case of abuse of such right we may charge you a reasonable fee in proportion with your request.
- 10.2. In case you disagree with the way we handle your Personal Data and/or you want to exercise any of your rights above, please contact the Company's Data Protection Officer at dpo@klips.com and we shall reply to you within 14 calendar days. In case you have unresolved concerns you have the right to complain to the data protection authority. You can find details about how to do this on the following website:
<http://www.dataprotection.gov.cy>

11. No Children's Data Collection

- 11.1. The Company understands the importance of protecting children's privacy. The Company's services are not intended for children under eighteen (18) years of age nor is the Company's website designed for use by children. Therefore, the Company does not knowingly or specifically collect children's personal data. If the Company collects such data mistakenly or unintentionally, the Company shall delete the information the earlier possible once it obtains knowledge thereof. If the Client becomes aware of such data collection, he/she shall notify the Company at DPO@Klips.com.

12. Personal data breach

- 12.1. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of any breach where we are legally required to do so. If you require further information on how we deal with a data breach, please contact us.

13. Privacy Policy Updates

- 13.1. The Company reserves the right to update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded on the Company's website so please review it frequently. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

14. The Information Regulator

- 14.1. If you have any enquiries regarding the Company's Privacy and Data protection Policy please email the Company's Data Protection Officer at dpo@klips.com
- 14.2. The Company shall try to respond to all requests within 14 calendar days. Please note that it may take us longer than 14 calendar days if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 14 (fourteen) calendar days of the receipt of your request and keep you updated.
- 14.3. If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the Cyprus' Data Protection Authority. You can find details about how to do this on the following website: <http://www.dataprotection.gov.cy>