

## Privacy Policy

At Wintrado.com one of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by Wintrado.com and how we use it.

This Privacy Policy (the “**Policy**”) sets out the Company’s obligation regarding the collection, processing, transfer, storage and disposal of personal data relating to existing and prospective Clients as well as to any visitors or users of the Company’s website(s), and other third parties (hthe “**Data Subjects**” and/or “**Clients**”) in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”).

The Company is committed to protect the privacy of all Data Subjects’ personal data. The Company would like to assure any existing or prospective Clients, applicants, users and visitors that it has taken measurable steps to protect the confidentiality, security and integrity of their information.

The Company controls the ways the Data Subjects’ Personal Data is collected and the purposes for which the Data Subject’s Personal Data is used by the Company, acting as the “data controller” for the purposes of applicable European data protection legislation.

“**Data 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.

“**Personal Data**” means any information relating to an identified or identifiable natural person.

## Log Files

Wintrado.com follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

## **Use of Personal Data**

The Company can only process Data Subjects' Personal Data when there is a genuine reason to do so and it must be one of the following:

- a) To fulfil any contract, the Company to which the Data Subject is a party or to take steps at the request of the Data Subject prior to entering a contract.
- b) The Company is subject to a legal obligation.
- c) Where the Data Subject has given consent to the Company to process his/her data.
- d) When the processing is necessary for the purposes of legitimate interest pursued by the Company or a third party, except when such interests are overridden by the interests of fundamental rights and freedoms of the Data Subject.
- e) When the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company.
- f) When it is in the Data Subject's vital interest or of another natural person.

The Company shall not be liable for misuse or loss of personal information and/or otherwise on website(s) the Company does not have access to or control over.

The Company will not be liable for unlawful or unauthorized use of the Data Subject's personal information due to misuse and/or misplacement and/or malicious use of the Data Subject's passwords, either by the Data Subject or any third party.

The Company will use, store, process and handle the Data Subject's Personal Information (in case they are a natural person or a legal representative) in accordance with the GDPR. The Company may be required to retain and use personal data to meet its' internal and external audit requirements, for data security purposes. Additionally the Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances and where this is strictly required for the performance of the services offered to the client under the Client Agreement, or where it is the Company's legal requirement, or where the Company is either legally permitted to proceed to such disclosure in compliance with the requirements of the GDPR:

- a) To comply with the Company's obligations under the GDPR, this Policy and the Company's Terms and Conditions, which may include laws and regulations outside the Data Subject's country of residence.
- b) To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside the Data Subject's country of residence.
- c) To monitor compliance with and enforce the Company's Platform terms and conditions.
- d) To carry out anti-money laundering, sanctions or Know Your Customer applicable checks.
- e) To protect the Company's rights, privacy, safety, property, or those of other people. The Company may also be required to use and retain personal data after the Data

Subject has closed the Data Subject's account for legal, regulatory and compliance reasons, such as the prevention, detection or investigation of a crime; loss prevention; or fraud prevention.

- f) To auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well.
- g) Only to the extent required, to other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form.
- h) To anyone authorized by you.

The Company also collects and processes non-personal, anonymized data for statistical purposes and analysis and to help the Company in providing its Data Subjects with better products and services in the future.

Data Subjects' information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than those stated above.

### **Cookies and Web Beacons**

Like any other website, Wintrado.com uses "cookies". These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accesses or visits. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

### **Privacy Policies and Confidentiality Obligations**

You may consult this list to find the Privacy Policy for each of the advertising partners of Wintrado.com.

Third-party ad servers or ad networks uses technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on Wintrado.com which are sent directly to users' browsers. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit. Note that Wintrado.com has no access to or control over these cookies that are used by third-party advertisers.

The Data Subject's Information (not in the public domain or already possessed by the Company without a duty of confidentiality) which the Company holds, is to be treated as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of their Services to the Data Subject or the furthering of the Data Subject Agreement, for managing the Data Subject's account, for reviewing their ongoing needs, for enhancing customer service and products, for giving the Data Subject ongoing information or opportunities

the Company believes may be relevant to the Data Subject, for improving their business relationship, for anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes.

### **Data Subject's rights over their Personal Data**

Under the GDPR, Data Subjects have the following rights:

- **Right of access** – you have the right to request from us to provide you with a copy of the personal data that we hold about you. The Company will give the Data Subject access to their personal data (including a copy or the ability to send the data to another provider) on request unless any relevant legal requirements prevent them from doing so or other exemptions apply. Before providing access to the Data Subject, the Company will ask him/her to prove their identity and give sufficient information about themselves.
- **Right of rectification** – you have a right to request from us to correct the personal data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right to request from us in certain circumstances to erase your personal data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies, the Company acting as your controller will erase your personal data from its records.

If the Data Subject requests the deletion of their personal data, this will result in the automatic closure of their account and the Company will remove their personal data from active processing. However, in accordance to applicable laws and regulations the Company will be required to maintain the Data Subject's personal data to comply with their legal and regulatory requirements as well as in accordance with their internal compliance requirements in relation to maintaining records.

- **Right to restriction of processing** – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.
- **Right of portability** – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply the Company will transfer your personal data to another organisation.
- **Right to object** – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Right to withdraw consent where we are relying on consent to process your personal data** –this will not affect the lawfulness of any processing carried out before you withdraw services to you. We will advise you if this is the case at the time you withdraw your consent

### **Retention period**

The Company shall not keep personal data for no longer than is necessary for the purpose for which they were collected in a form which allows the individual to be identified, however, personal data may be stored for longer periods where the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the applicable provisions of the GDPR legal framework subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of the individual.

The Company processes and stores your personal data as long as necessary for the performance of the Company contractual and other legal obligations, however, following the termination of any contractual relationship, the Company may keep your personal data for five (5) years (and where requested by any competent or supervisory authority, for a period of up to seven (7) years) due to the following reasons:

- To respond to any questions or complaints.
- To show that the Company treated you fairly.
- To maintain records according to rules that apply to the Company such as under applicable tax, money laundering laws and regulations.
- To preserve evidence that may be needed for the establishment, exercise or defense of legal claims.

### **Third Party Privacy Policies**

Wintrado.com's, Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party and servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

## **Children's Information**

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity. Wintrado.com does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best to promptly remove such information from our records.

## **Filing a complaint**

If you are not satisfied with how the Company has used, or uses your personal data, please let the Company know by submitting a complaint at the following email address [.....]. you also have the right to complain to the Office of the Commissioner for Personal Data Protection as follows [...].

## **Online Privacy Policy Only**

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regard to the information that they share and/or collect in Wintrado.com. This Policy is not applicable to any information collected offline or via channels other than this website.

We may make changes to this Policy from time to time, and it is important that you check this Policy for any updates. Any personal information we hold will be governed by our most current Privacy Policy. If we make changes, we consider them to be important, we will communicate them to you.

## **Consent**

The Company may collect the Client's Information in regard to their use of the Company's website(s), such as pages visited, frequency, duration of visit and provision of services. With regards to each of the Client's visits to the website, the Company may automatically collect information including internet protocol (IP) address, login information, browser type and version, time zone, phone numbers used to call their customer service number.

By using our website, you hereby consent to our Privacy Policy and agree to its Terms and Conditions.