

## 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 (the “**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.

Specifically, the Clients' personal data will most commonly be used in the following circumstances:

- a) Where the Company needs to perform the contract it has entered with the Client or in order to take certain steps prior to entering into a contract with the Client. Processing is necessary for the Company in order to provide a Client with its products and services and more specifically in order:
  - To verify the Client's identity;
  - To manage the account the Client holds with the Company;
  - To send to the Client any information about educational material or e-learning services.
- b) Where the Company needs to comply with a legal obligation.
- c) Where the Company has legitimate interests to use the Client's personal data. More specifically, the Company may process the personal data regarding the following purposes:
  - To develop or enhance its products and services;
  - To enhance the security of the Company's network and information systems;
  - To maintain its records;
  - To manage its business operations and comply with internal policies and procedures;
  - For the analysis of statistical data which helps the Company in providing its Clients with better products and services in the future.
- d) Where the Client has given his/ her consent:
  - The Company will ask for the Client's consent when the Company wishes to provide marketing information to its Clients in relation to its services which may be of interest to the Client.

In this respect the Company may process personal data to inform its Clients about new campaigns and services or offers that may be of interest to the Client. The Company may only process such personal data if it has obtained the Client's explicit consent to do so.

The Clients may withdraw such consent at any time. If the Client no longer wishes to receive, for example, any promotional communications, he/ she may opt-out of receiving them. This right does not affect the lawfulness of processing that was based on that consent before its withdrawal.

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 persons. 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.

### **Collection of personal data**

The Company collects different types of personal data from Clients who visit its platform, or access, use or request services offered by the Company.

The provision of certain personal services is required for establishing a contractual relationship with the Company. Persons not wishing to provide such personal data will not be able to become Clients of the Company or be provided with any services.

The personal data received from the Clients, collected and processed by the Company are required for the communication, identification, verification and assessment for the business relationship establishment with the Client, contract performance and legal compliance.

There may be cases where the Company relies on the consent of the individual as the legal basis for the processing or using of his/ her personal data.

Consent is considered as valid when it is a freely given, specific, informed and unambiguous indication of the individual's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him/ her.

The Company shall as the case may require, be able to prove that the individual has given his/ her consent for the concerned processing activity, and shall be able to demonstrate that:

- the individual's consent is easily distinguishable from any other matter relating to the individual.
- the individual's consent is in an intelligible and easily accessible form, using clear and plain language.
- the individual has been informed on his/ her right to withdraw consent before the individual providing his/her consent on the first place.

The individual is entitled to withdraw his/ her consent at any time. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent, before its withdrawal. It shall be as easy to withdraw as to give consent.

## **Sharing and disclosure of personal data**

In addition to the above and in the course of the performance of the Company's contractual and statutory obligations, the Clients' personal data may be disclosed to third parties. Most of such third parties enter into contractual arrangements with the Company by which they observe data protection and confidentiality according to applicable data protection legislation.

Under the circumstances referred to above, recipients of personal data may be, for example:

- Service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support;
- Governmental and regulatory bodies, including law enforcement authorities, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Company to comply with its legal and regulatory obligations;
- External consultants including legal and tax consultants;
- Market research companies;
- Affiliates of the Company etc.

## **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 accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

First party cookies are cookies set by the website you are visiting. Only that website can read them. In addition, a website might potentially use external services, which also set their own cookies, known as third-party cookies.

Persistent cookies are cookies saved on your computer and that are not deleted automatically when you quit your browser, unlike a session cookie, which is deleted when you quit your browser.

Cookies can also be used to establish anonymized statistics about users browsing experience.

### **Cookies Analysis:**

The website uses four (4) types of cookies and these are used for the purpose described below and apply once a user provides his/ her consent to the relevant purpose.

**Necessary:** these cookies are necessary for the website to become functional, allowing core functionalities such as navigating the website and accessing secure fields of the website. For this reason they do not require your consent. You may disable these by changing your browser settings, but this may affect how the website functions.

**Analytical:** to measure and improve site performance via anonymous reporting of how users interact with website content.

**Marketing:** to provide a more personalized user experience and more relevant ads via analysis of user activity that allows us to effectively target our marketing activities.

**Targeting:** to track your browsing habits in order to deliver personalized advertisements on other sites. Once enabled, these cookies can be disabled through your browser settings.

### **Third Party Cookies:**

Our website displays content from external providers, e.g. *[YouTube, please complete accordingly]*. To view this third party content, you first have to accept their specific terms and conditions (this includes their cookies policy which we do not control). Third party providers on our website are the following:

- YouTube
- [..]
- [..]

These third party services are outside of the control of the Company.

### **Removing Cookies:**

You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited. However, you may also lose some saved information (e.g. saved login details, site preferences etc).

### **Managing site-specific Cookies:**

For more detailed control over site-specific cookies, check the privacy and cookie settings in your preferred browser.

### **Blocking Cookies:**

You can set most modern browsers to prevent any cookies being placed on your device, but you may then have to mutually adjust some preferences every time you visit a site/ page.

## **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' browser. 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. This shall enable you to ask the Company to restrict the processing of your personal data if:



- it is not accurate;
  - it has been used unlawfully but you do not wish it to be deleted;
  - it is not relevant any more, but you wish the Company to keep it for use in possible legal claims;
  - you have already asked the Company to cease using your personal data but you are expecting the Company to confirm if it has legitimate grounds to use such 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.
  - **Right to lodge a complaint with the data protection authority** – if you have a concern about the Company's privacy practices, including the way in which the Company handled your personal data, you can report it to the [Office of the Commissioner for Personal Data Protection](#).

To exercise any of the above rights you may contact the Company at *[email address to be included herein]* or by post at the postal address: *[the address of the Company's premises to be included herein]*

## 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 organisational 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 ad 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 eighteen (18) nor is the Company's website designed for use by children. 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 efforts to promptly remove and/or delete such information from our records. If you become aware of such data collection you may notify the Company at *[email address to be added]*.

### **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 [info@wintrado.com](mailto:info@wintrado.com).

You also have the right to complain to the [Office of the Commissioner for Personal Data Protection](#).

### **Online Privacy Policy Only**

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared 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 to be important, we will communicate them to you.

### **Consent**

In addition to the above provisions outlined in the ‘Collection of personal data’ the Company may collect the Client’s Information in regards 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.

### **Amendments to this Policy**

The Company reserves the right to review and amend this Policy from time to time for any reason and notify its Clients of any such amendments accordingly by posting an updated version of this Policy on the Company’s website. The Company will notify you about any material changes to this Policy by placing a notice on its website or by communicating with you directly.

### **Enquiries and Contact Details**

For any general enquiries regarding this Policy please contact the Company by emailing us at [info@wintrado.com](mailto:info@wintrado.com).

For any data subject requests, or questions about how the Company processes personal data, please contact the Company’s Data Protection Officer via:

DPO: Mr. Harry Charitou

Email: [harry.charitou@wintrado.com](mailto:harry.charitou@wintrado.com)



Postal Address: 254 Arch. Leontiou A, Suite 22, 3020 Limassol, Cyprus

Tel. No.: [357 25 333223]