



PERSONAL DATA PROCESSING POLICY

(PRIVACY POLICY)



PERSONAL DATA PROCESSING POLICY (PRIVACY POLICY)

SAX INVEST LTD

08/23/2019

This policy is covered on usage by websites, which are operated under the group of companies SAX INVEST LTD, if it is third-parties application, original site-pages, on behalf of group of the companies SAX INVEST LTD used on the platforms such as Facebook either YouTube, also, the applications which mentioned here (next — “ Ours/ web-site/s ”).

WHAT IS “PERSONAL DATA”?

Personal data is any information that relates to an identified or identifiable living individual.

WHY DO WE NEED PERSONAL DATA TO PROVIDE SERVICES?

When you visit our website, certain data (for example, your IP address, type of device, type of browser, etc.) is automatically collected by our devices. In some jurisdictions, including EU countries, such information is classified as personal in the relevant regulatory acts on the protection of personal data.

Also the website stores data about how, in what sequence you interacted with the site, including the pages you visited and the links that you clicked on. Data processing and storage of such data allows us to personalize the content of the site and make the visit more efficient and convenient. This data is partially collected using cookies, more detailed information you can find in the Cookie Policy section.

HOW WE COLLECT YOUR PERSONAL DATA?

We receive your personal information from different sources, such as :

Data that you provide voluntarily:

- When you register and fill out forms and questionnaires on the website, communicate over the phone, send us emails or log in to your personal account, you leave your identification, contact, financial and other data;
- When you use SAXINVESTLTD products or services;
- When you subscribe to publications of SAXINVESTLTD or third parties related to;
- When you agree to receive promotional materials and newsletters;
- When you participate in loyalty programs, promotions, surveys, contests SAXINVESTLTD;
- When you leave feedback and comments on the SAXINVESTLTD website.

SAXINVESTLTD in some cases may request certain personal data that you can provide at your discretion. Please note that the request must list the exact personal data that you are requested to provide.

Data collected by the Company automatically:

When you visit our website, certain data (for example, your IP address, type of device, type of browser, etc.) is automatically collected by our devices. In some jurisdictions, including EU countries, such information is classified as personal in the relevant regulatory acts on the protection of personal data.

The website also stores data about how, in what sequence you interacted with the website, including the pages you visited and the links that you clicked on. Processing and storage of such data allows us to personalize the content of the site and make the visit more efficient and convenient. This data is partially collected using cookies, information about which can be found in more detail in the Cookie Policy.

WHAT PERSONAL INFORMATION DO WE COLLECT AND STORE?

Providing customer service

Type of data:

Provision of the Services	Type of data: identification information (name, surname, country of residence, address and other similar information), contact details (email address, phone number, web page and others), copies and images of national identification documents (passport, id-document, permission of residence and others), financial information (bank account number; bank card number and name of its holder, documents which confirm the source of fund, and others), documents confirming the fact of political status.
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	<p>Purpose: register you as a client, to provide the opportunity to create a personal account where the Client can transfer or withdraw the funds. Also, the provision of the opportunity to use the services of the Company, the provision of the opportunity to carry out non-trading operations in accordance with the Rules for Non-Trading Transactions, the receipt of the opportunity to collect information regarding the occurrence of possible debt to the Company.</p> <p>Reasons: implementation due to the Client Agreement, fulfillment of legislative requirements.</p>
<p>Prevention of money laundering and terrorist financing, compliance with regulatory and legal requirements, risk management</p>	<p>Type of data: transactions, finance, identification.</p> <p>Purpose: implementation of the existing legislation; detection, investigation, prevention of money laundering; response to claims; to provide information to the relevant government authorities in cases specified by law. Collection of information is necessary in order to implementation due to the law and to against money laundering, including information "Know Your Client" ("Know your client"); information regarding international sanctions or other restrictive measures, as well as information on illegal and political actions of a potential Client, which may affect the Company's decision to cooperate with the Client.</p> <p>Reasons: implementation of the existing legislation.</p>
<p>Marketing</p>	<p>Type of data: contacts, consent, and correspondence.</p> <p>Purpose: marketing activity and the provision of information regarding the products and services of the Company.</p> <p>Reasons: implementation due to the Client Agreement.</p>
<p>Automated decisions.</p>	<p>Type of data: The psychological profiling by analyzing personal data, using software that evaluates your specific personal characteristics and predicts risks or outcomes. For example, we can analyze personal information about your general behavior on the website and the decisions which you made.</p> <p>Purpose: adoption of automatic decisions, including profiling, assignment to a certain category of interests, risks, offers of loyalty packages, according to potential interests.</p> <p>Automated decision-making is the process of making a decision by automated means without any human involvement. In cases of making an automated decision, you have the opportunity to challenge the decision and require a decision to be reviewed by an employee of the Company.</p> <p>Reasons: implementation due to the Client Agreement, personalization of the website, providing information in accordance with the interests of the user.</p>

Common purposes, for which we can use Your personal data:

- for our services and the fulfillment of our treaty obligations to customers and other third parties;
- for the analysis, processing, and settlement of claims;
- for data analysis, which helps us assess risks, determine the cost of our products and improve the quality of our services;
- to prevent and use cases of fraud, legalization of illegally obtained money, terrorism and other crimes;
- to develop new and improve the quality of existing services;
- to conduct and expand our business activities;
- to perform verified biographical data, if it is permitted by law;
- to provide administrative activities;
- for the implementation and protection of our customers or third parties;
- to cooperate with oversight bodies by which we going under and met its legal obligations;
- for research and development of new insurance products;
- for the audit of our activities; as well as for marketing purposes.

TO WHOM PERSONAL DATA IS REFERRED TO?

SAXINVEST LTD has the right to provide your personal data to third parties in the following cases:

- For companies related to the SAX INVEST LTD group of companies. Since we are an international company, we can share your personal data within the group. Moreover, this information is protected by this Policy and is used for the purposes listed in this document.
- Insurance companies, intermediaries, financial institutions, retrocessionaires and business partners who use your personal information in connection with the provision of services and / or claims processing. For example, we can transfer your personal information to law firms, lawyers for the settlement of claims.
- Service providers who provide us with services and conduct other business with us, for example, IT and analytics service providers, insurance service providers, auditors, and consultants.
- To any law enforcement agency, court, supervisory authority, public authority or professional organization, at their legal request or for the purpose of resolving a conflict.

To any third party, when we sell assets or a company from the SAX INVEST LTD group of companies or a significant share in them. In the event of such a sale or transfer, we will take reasonable and measures so that the acquirer of your personal data takes the necessary steps to protect the received data in accordance with the terms of this Policy.

RIGHT OF AN INDIVIDUAL ON STORED PERSONAL DATA

- The right on access to your personal data;
- The right to correct data stored about you which saved on our service;
- The right to delete all personal data;
- The right to restrict our use of your personal data;
- The right to object against our usage of your personal data;
- The right to receive your personal data; also as
- The right to file a complaint with your local data protection authority.

A request to terminate the processing or deletion of all stored data will be executed by SAXINVEST LTD in accordance with the terms going under relevant legislation, followed by a review of the list of services provided to the User. This does not mean that your data will be deleted immediately, since it will be stored on our server in order to fulfill numerous legislative obligations, in particular, provisions of the Law 13 on Prevention of Money Laundering and the Financing of Terrorism (LN 372/2017), in accordance with by which we are obligated to keep any information collected for at least five years from the date of closure of your Account in order to prevent, detect, analyze and investigate cases of money laundering or terrorist financing activity. After this period, your personal data will be deleted from our records.

HOW IS PERSONAL DATA PROTECTED?

The company adopted all necessary technical and organizational measures to protect all personal data that will be collected and processed.

The measures taken provide a level of security that meets the risks connected with the processing of personal data. In particular, the Company:

- Stores personal data on secure servers.
- Uses encrypted links to transmit data whenever possible in cases when necessary.
- It applies other security measures: firewalls, authentication systems (for example, passwords) and access control mechanisms to prevent unauthorized access to systems and data.
- Regularly reviews the processes for collecting, storing and processing data, including physical security measures, in order to protect against unauthorized access to systems.

- Restricts access to personal data to Company employees, contractors, and agents who need to know such information for processing purposes and who are subject to strict contractual obligations to maintain confidentiality.

HOW LONG IS PERSONAL DATA STORED?

According to number of statutory obligations, specifically the Prevention of Money Laundering and Funding of Terrorism Regulations (LN 372/2017) Article 13, which obliges us to retain any information stored for a minimum period of five years from the closure of your Account, for the purposes of the prevention, detection, analysis and investigation of money laundering or funding of terrorist activities. After this period has elapsed, your Personal Data will be deleted from our records.

WHERE ARE PERSONAL DATA GOING TO BE PROCESSED BY US?

As we are an international group of companies, your personal data can be transferred, stored and processed in other countries, which may include countries that do not provide an adequate level of protection of personal information in accordance with EU law.

If in the mentioned country there are no similar legislative measures for the protection of personal data, SAXINVEST LTD, in accordance with the requirements of the legislation, guarantees that the rights of the User will be adequately protected by appropriate technical, organized, contractual or other legal measures. This includes the conclusion of agreements on the transfer of personal data with the aforementioned third parties using similar security measures, more detailed information of which can be provided upon request. To obtain such information, the User must send a notification to SAXINVEST LTD by e-mail to the Operator's email address: support@saxinvest.net, or to the Information Protection Officer at security_department@saxinvest.net, marked "Request for cross-border data transfer".

AMENDMENTS TO THIS POLICY

We may change or update this Policy from time to time. If we made any changes, we will post an updated version on our website.