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## PRIVACY POLICY

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### BACKGROUND:

Firmtouch Trading Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone and will only collect and use personal data in ways that are described in this Policy, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our Site. If you do not accept and agree with this Privacy Policy, you must stop using our Site immediately.

Who we are:

We ("Firmtouch Trading Ltd", "we", "our" and "us") are:

Firmtouch Trading Ltd,  
1, Agias Fylaxeos, KPMG CENTER,  
1st floor, 3025, Limassol, Cyprus

### 1. What Does This Policy Cover?

This Privacy Policy applies only to your use of our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 2. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.

### 3. What Are Your Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 9.
- b) The right to access the personal data we hold about you. Part 8 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 9 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 9 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.

- f) The right to object to using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 9.

Further information about your rights can also be obtained from the Data Protection Commissioner ([http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home\\_en/home\\_en?opendocument](http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_en/home_en?opendocument)).

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Data Protection Commissioner at the Site provided above.

#### **4. What Personal Data Do We Collect?**

Subject to the following, we do not collect any personal data from you. We do not place cookies on your computer or device, nor do we use any other means of data collection.

If you send us an email, we may collect your name, your email address, and any other information which you choose to give us.

#### **5. How Do We Use Your Personal Data?**

If we do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see Part 6, below.

As stated above, we do not generally collect any personal data. If you contact us and we obtain your personal details from your email, we may use them to respond to your email.

Any and all emails containing your personal data will be deleted no later than our legal obligation requires it and after your query or reason of initial communication has been resolved.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

We will not share any of your data with any third parties for any purposes other than for lawful or legitimate reasons.

#### **6. How and Where Do We Store Your Data?**

We may store some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in Cyprus and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within Cyprus and under the GDPR as follows.

We store your data with external third parties, as detailed below in Part 7 that are based outside

of the EEA. The following safeguards are applied:

We use specific contracts with external third parties that are concluded in accordance with regulations adopted by the European Commission for the transfer of personal data to third countries. Contracts like this ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the European Commission site ([https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)).

Please contact us using the details below in Part 9 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

## **7. Do We Share Your Personal Data?**

We will not share any of your personal data with any third parties for any purposes, except the cases directly indicated in this Policy.

We may sometimes contract with third parties for data processing purposes.

If any of your personal data is transferred to a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 6.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within Cyprus and under the GDPR, as explained above in Part 6.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **8. How Can You Access Your Personal Data?**

In addition to your opt-out right, you may exercise the following rights at any time:

- You may ask us to provide you with copies of the personal information that we hold about you, or with information about the processing of such information.
- You may ask us to update and correct any out-of-date or incorrect personal information that we hold about you.

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email shown in Part 9. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

If you wish to exercise any of these rights, then please contact us as described in part 12.

## 9. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time for various reasons such as changes to reflect legal requirements, changes in industry practices, technological developments or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

## 10. **Children**

We recognize that we have a special obligation to protect personal information obtained from children. We will not knowingly collect personal information from any child, or process such information, without parental consent. For the purpose of this Policy, a child means any individual who is under the age of 18 (or the minimum legal age to consent to the collection and processing of personal information where this is different under applicable law).

## 11. **Security**

Firmtouch Trading Ltd has implemented all reasonable technical, administrative and physical security measures to protect the security of your personal information.

All received information that the client provides is stored on secure servers and only authorized staff have access to this information. We take reasonable precautions to prevent the loss, misuse or alteration of your personal information. Our employees, contractors and agents may be given access to your personal information which we collect, but their use shall be limited to the performance of their duties in relation to facilitating your use of the Services. Our employees, contractors and agents who have access to your personal information are required to keep that information confidential and are not permitted to use it for any purposes other than those listed above or to deal with requests which you submit to us.

## 12. **How Do You Contact Us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request or for any enquiry, please use the following details:

Email address: [privacy@firmtouch.org](mailto:privacy@firmtouch.org)