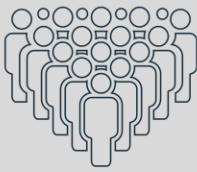




CrowdTech

PRIVACY POLICY

Version 2.0
January 2019



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Introduction

Crowd Tech Limited (hereinafter the “Company” or “us” or “we”) is a Cypriot Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 297365. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under the license No. 202/13.

The Privacy Policy (hereinafter the “Policy”) is to establish guidelines as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter “GDPR”).

The policy outlines how Crowd Tech handles personal data. Your privacy is important to us and we are committed to protect and respect your personal data. Please read and understand the Policy and contact the Company in case you have any queries or need further information.

By accessing our website and platform including using any of the communication channels to contact us, we consider that you have read and understood the terms of this Policy and how we process any information you disclose to us including personal data prior to becoming a client. Once you open an account with us, you agree that this Policy, including any amendments will govern how we collect, store, use, share and in any other form process your personal data and your rights during our business relationship and after its termination.

Collection and Storing of Personal Data

The Company collects, uses, stores, discloses and transfers personal data only when needed to provide its services and fulfill its contractual obligations. The Company may also use your personal information about the products you trade in your account. The Company will notify you if it intends to use your personal data for any other purpose and shall request your consent. You can contact us at any time with questions or concerns.

Note that you can control what and how you receive communications from us and how we use your information.



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The Company may collect the following from you when you sign up/register to a trading account (both live/demo):

- | | |
|------------------------|--|
| ✓ Name | ✓ Trading knowledge & experience |
| ✓ Surname | ✓ Utility bill |
| ✓ Date of Birth | ✓ Credit card/ bank account/ e-wallet details |
| ✓ Gender | ✓ Details of your visits to our Website and App |
| ✓ Phone | ✓ Source of funds/wealth |
| ✓ Email | ✓ Communication between yourself and us |
| ✓ Address | ✓ Publicly available information about you |
| ✓ Local Identification | ✓ ID/Passport/Driving License |
| ✓ Location Data | ✓ Financial Information |
| ✓ SSN/Tax ID | ✓ IP Address & Device specifications relating to your trading experience |
| ✓ Education | |

If you are a corporate client we are required to collect additional information such as corporate documents of address, shareholders, directors, officers including additional personal information for the shareholders and directors. We have the right to ask any additional information we deem necessary for the purpose of satisfying legal and regulatory requirements.

Personal Information we automatically collect & automated analysis

The Company automatically collects your IP address and trading history. The Company also collects and uses the personal information you provide in the Appropriateness Test (risk assessment) in order to place you to one of the three levels the Company has which is based on your risk appetite. This profiling is for Anti-Money Laundering and Combating the Financing of Terrorism purposes which the Company has a duty to comply with.

Our legal basis/obligations

Due to internal and external audit requirements, for data security purposes and as we believe to be necessary or appropriate and in order to perform our contractual obligations towards you, the Company may be required to disclose your personal data in order to:

- ✓ comply with legal and regulatory obligations
- ✓ respond to requests from courts, public and government authorities, enforcement



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- agencies and regulatory agencies
- ✓ Protect the Company's rights, privacy, safety and property
- ✓ Enforce the Terms and Conditions and policies
- ✓ Investigate, detect, prevent or take action regarding illegal activities or other wrongdoing

Retention of Personal Data

Under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments and amending Directive 2002/92/EC, the Company is obliged to keep your personal data provided to us for a period of five years and, where requested by the competent authority, for a period of up to seven years after the termination of the business relationship. When we no longer need personal data, we securely delete or destroy it.

Cookies

The Company uses cookies on the Website and Platform in order to store and collect information. Such information include, but not limited to, your IP address, software configuration, aggregate use information, geographical location data and operating system. Cookies are small text files which are sent from us to your computer which are stored, read and help us load your personal preferences and improve your experience. The Company uses both session ID and persistent cookies. You can remove persistent cookies by following directions provided in your internet browser's 'Help' file. You may reject our cookies which might result in a lower standard of your experience. Please read the Company's Cookie Policy which is available on our website for further information regarding cookies.

3rd Party Data Collection

We may disclose to these third parties only the minimum personal data that is required to perform their contractual obligations to us. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us. When the Company is transferring your personal data to third parties, it always takes all appropriate measures to protect and safeguard your personal data according to this Policy. In general, the Company requires that the third party processors are also diligent and in compliance with Data Protection principles as well as this policy.. In this view, your personal



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data may be transferred to the following:

- ✓ Marketing, trading education, and customer support service providers
- ✓ Legal counsels and legal consultants
- ✓ Financial institutions, payment service providers, cards payment processors
- ✓ Supervisory, regulatory and public authorities, including courts of justice, law enforcement authorities
- and other governmental bodies
- ✓ Data storage and archiving providers
- ✓ Fraud detection agencies
- ✓ Information aggregation agencies for Anti-Money Laundering and Combating the Financing of Terrorism
- ✓ Fraud detection agencies
- ✓ Auditors and accounting consultants

Transfer of Data outside the EEA

The Company's operations are exclusively targeting the European Economic Areas ("EEA"). The Company does not offer its services to Clients outside the EEA, but your personal data may be transferred, processed and stored outside the EEA in order for the Company to perform its contractual obligations towards you. When the Company is transferring your personal data to third countries, it always takes all appropriate measures to protect and safeguard your personal data according to this Policy. The Company will take all reasonably necessary measures to ensure that data is treated diligently and securely, and in accordance with this Privacy Policy.

Your rights

The Company respects your rights to access and control your personal data. The Company will respond to any requests you have regarding your personal data and if and where applicable, will correct, amend or delete your personal data.

Individuals have the following rights under GDPR:

- ✓ Right to be informed
- ✓ Right of rectification
- ✓ Right to object
- ✓ Right to restrict processing
- ✓ Right to data portability
- ✓ Right to erasure
- ✓ Right of access
- ✓ The right not to be subjected to automated decision-making including profiling



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All of the above rights do not apply in all circumstances. The Company will make all reasonable and practical effort to comply with your request. The Company might not be able in some cases to fulfil your request, if it is not consistent with applicable laws and regulations which upon request you will be advised accordingly.

Please note that the timing of delivery of information following receipt of a request is, without undue delay and at least one month of receiving the request. On some occasions, depending on the complexity of your request, it might take up to three months.

Regarding the fees, no fee will occur for a single copy of the requested data while reasonable administrative effort is required in order to deliver. Reasonable administrative charges will apply for further copies. If a fee does apply, we will provide you with the relevant cost which you will have to accept before the Company proceeds with the process of your request. Failure to do so, might result in the Company's refusal to comply with your request.

Your request to any of the above rights must come from the email you used when you registered with us and should be sent to dpo@trade360.com

Data Security/Integrity

The Company makes best effort to protect your personal data. We maintain security standards, procedures and commercially acceptable means to ensure that your personal data is protected and the risk of any kind of destruction, loss, alteration, disclosure is minimized.. While we take adequate measures to protect your personal data, we cannot guarantee its absolute security.

Sharing and Disclosure

We do not share your personal information with others except as indicated within this policy or when we inform you and give you an opportunity to opt out of having your personal information shared.

We will share your information in the following ways:

- **With third party service providers, agents, or contractors.** We use other companies, agents or contractors ("Service Providers") to perform services on our behalf



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or to assist us with providing services to you. For example, we may engage Service Providers to process credit card transactions or other payment methods. Or, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, to collect debts, and to analyze and enhance data (including data about users' interactions with our service). These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the information we request may be collected by third party providers on our behalf. We do not authorize them to use or disclose your personal information except in connection with providing their services.

- **Analytics.** Specifically for analytics providers, we use Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/> Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

- **Advertising.** We may use third-party Service Providers to show advertisements, which may include targeted advertisements on a third party site after you have visited our website. We and the third party service providers use cookies to inform, optimize, measure performance serve ads based on your previous visits to our site. Any tracking that a third party performs is subject to their own privacy notice.

Please note at this time, we do not recognize automated browser signals regarding tracking mechanisms, which may include "do not track" instructions.

We work with Google AdSense & DoubleClick Cookie Google, as a third party vendor, uses cookies to serve ads on our site. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Service or other websites on the Internet. You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: <http://www.google.com/ads/preferences/>



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Google AdWords/Analytics

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page at <http://www.google.com/intl/en/policies/privacy/>

Twitter: You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405> You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

Facebook: You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

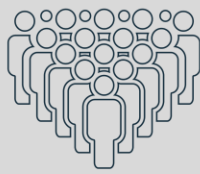
To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

To see more about Facebook's participation in the Digital Advertising Alliance please visit the Choices section of this notice.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

We may participate in [Facebook.com](https://www.facebook.com)'s Custom Audience or LinkedIn's Audience program which enables us to display personalized ads to persons on our email list when they visit Facebook or LinkedIn respectively. We provide Personal Information such as your email address and phone number to the social media provider to enable it to determine if you are a registered account holder. You may opt-out of participation in this program by contacting us as noted below. You may also opt out of receiving these ads from the social media network directly.

· **Payment Providers:** We use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their own privacy notice. The payment processors we work with adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint



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effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with can be found on the Company's website <https://www.trade360.com/en-gb/help-center/payment-processors/>

- **To comply with legal process or to protect the Company.** If we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to enforce applicable terms of use, including investigation of potential violations thereof; to protect the safety, rights, or property of the public, any person, or the Company as required by law; or to detect, prevent, or otherwise address, security or technical issues or illegal or suspected illegal activities (including fraud).
- **Business Transfers.** We may engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy. In such transitions, customer information is typically one of the business assets that is transferred or acquired by a third party. In the unlikely event that we or substantially all of our assets are acquired or enter a court proceeding, you acknowledge that such transfers may occur and that your personal information can continue to be used as set forth in this privacy policy.

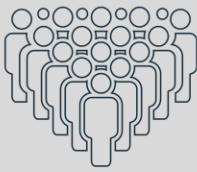
Minors

The Company does not offer its services to any person under the age of 18. The Company will not knowingly collect any personal data from or about minors. Minors should not use any of our services nor provide to us any personal data of themselves. If you are aware that a minor has used our services and/or provided us with personal data, please inform us by sending an email to dpo@trade360.com

Review of the Policy and Updates

This policy may be updated from time to time, therefore please check for any updates. If we execute changes we consider to be important, we will communicate them to you.

It is important that the personal data we hold about you is accurate and up to date. In case your personal data changes during your relationship with us, please inform us.



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Complaints/Queries/Contact us

In case you have any queries, complaint(s) or need further information, please contact the DPO.

DPO Contact Details: Christodoulos Papadopoulos - CPBROS LTD (geevo®)
dpo@trade360.com

Be advised that if you are not satisfied with the Company's response to your complaint, you have the right to lodge a complaint to the Office of the Commissioner for Personal Data Protection of Cyprus at <http://www.dataprotection.gov.cy>