



## PRIVACY POLICY

## Company's profile

AUSPRIME is the tradename of AC Markets (Europe) Limited (hereinafter "the Company", "We", "Our", "Us"), which is registered with the Register of Companies and Official Receiver in Cyprus under registration number HE 348274 and is registered as a Cyprus Investment Firm (CIF) and licensed by the Cyprus Securities and Exchange Commission (CySEC) under license number 350/17 in accordance with the Markets in Financial Instruments Directive (MiFID II).

The Company operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 2017, Law 87 (I)/ 2017, as amended from time to time.

## Introduction

As part of our daily business operations, we need to collect personal information from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services, as well as when providing them with the respective information.

Your privacy is very important to us. We are committed to protecting and respecting your personal data. This Privacy Policy describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

## Commitment

Ausprime respects the privacy of any user that accesses its website(s). We are therefore committed in taking all reasonable steps in safeguarding the personal data of any existing or prospective clients, applicants and visitors. The Company is committed to safeguard the confidentiality of your personal information or data it collects, uses and/or holds in accordance with the applicable data protection laws and regulations and particularly, the provisions of the European General Data Protection Regulation (GDPR) EU 2016/679 and any subsequent regulations or laws adopted by the Republic of Cyprus with reference to the GDPR (hereinafter 'Data Protection Laws').

## Data Protection Officer

We have appointed a Data Protection Officer ("DPO"). Our DPO has a number of important responsibilities including but not limited to:

- a. Monitoring Ausprime compliance with the provisions of the GDPR;
- b. Raising awareness of data protection issues, training Ausprime staff and conducting internal audits; and
- c. Cooperating with the supervisory authority.



If you have any questions about this privacy policy, including any requests to exercise your legal rights, please send us an email at: [DPO@ausprime.eu](mailto:DPO@ausprime.eu)

### Information we Collect:

Throughout our cooperation we collect information directly from you, through any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website, subscribe to our service or any other activities carried out on our website or any connected applications. The information you provide may also be used by the Company to inform you regarding its services. The information that we may collect from you includes the following:

- Personal information you provide to us on applications and other forms, include but are not limited to your first and last name, email, country and city of residence, phone number, social media profile details, IP address, nationality, tax identification number, date of birth, residential address, bank details, financial situation, employment status, trading activity, transaction history, account balance information (“Personal data”);
- We are also required by law to collect certain Know Your Client (“KYC”) documentation in order to verify your identity. KYC documents may include but are not limited to documents that you provide to us to verify your identity, such as your passport/identity card, utility bills and/or bank statement or your company incorporation details.
- We may also collect indirect information from you, which we use purely for verification, security or purely for browsing/ functionality purposes. Such information may include your (IP) address, browser type, operating system, Internet service provider (ISP), cookies. IP address.

The Company is obligated by the regulations of Cyprus Securities and Exchange Commission to keep your Personal Data on record for a period of five years which is calculated after the execution of the transactions or the termination of the business relationship or even longer if it is requested by the CySEC.

### Purpose for which we will collect your personal data

We collect, use, disclose, store and process your personal data for the performance of our services as required by law. We use your personal data to provide you with the services you request through our Website and Platform so as to perform our contractual obligations related to those services.

We also collect your personal data for internal purposes including the improvement of customer experience, promotional and marketing services (e.g. emails, social media, SMS), customer care, training purposes and administration matters. Such data is safely stored via physical or electronic means and procedural controls, and it is treated CONFIDENTIAL. We only collect personal data that is adequate and relevant for the purposes of our business and for a reasonable period of time as required by law. We never ask for more information that is required by law.



The Company needs to comply with the Anti-money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also, the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept so as the Company is able to demonstrate to the regulator that it has acted in accordance with the legislation.

The Company will ask for the Client's consent in regards to the provision of marketing information in relation to the products and services offered. The Client consent is provided by signing the Client agreement between the contractual parties. The Client may withdraw such consent at any given time by sending an email to [dpo@ausprime.eu](mailto:dpo@ausprime.eu). The Company shall not disclose to a third party any of its clients' confidential information unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

### Your legal right

You have the right to information which includes among others, where personal data is stored, how the data was collected, and for what purpose. You also have the right to access your personal data. If you wish to receive a copy of the personal data we hold about you, we will give you such copy upon receiving a written request by you, unless any relevant legal requirement prevents us from doing so. Please note that we may need to request specific information from you or contact you to ask for further information to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

#### a. Information and Access

You have the right to request access to your personal Data and if so, to be provided with a copy of that Data.

#### b. Rectification

You have the right to request correction of Personal Data in order to correct or complete the provided Personal Data.

#### c. Right to Deletion

You can request to delete/remove your Personal Data ("right to be forgotten") under certain circumstances, and for instance if you withdraw your consent. However, we may not always be able to comply with your request of erasure due to specific legal reasons and we will notify you, if applicable, at the time of your request.



**d. Processing Restriction**

You can request from the Company to restrict the processing of your Personal Data if it is not accurate, if it has been used unlawfully or if it is not relevant anymore but you wish not to be deleted for any reason and waiting for the Company's confirmation to stop using your Personal Data.

**e. Right to portability**

You can request to obtain your Personal Data in a readable format. Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: [dpo@ausprime.eu](mailto:dpo@ausprime.eu)

**f. Right to Stop Processing**

You can request from the Company to stop processing his/her Personal Data, and the Company will do so if a) the Company cannot demonstrate compelling legitimate grounds for the processing or b) the Company is processing Client's Personal Data for marketing purposes.

**g. Right to Withdraw Consent**

You can withdraw your consent at any time in situations where we are relying on your consent to process your Personal Data, and in those instances if you withdraw your consent, we may not be able to provide you with our services. We will advise you if this is the case at the time you withdraw your consent.

**h. Right to complain**

If you have grounds to believe that the Company does not appropriately use your Personal Data, you can submit a complaint to the Office of the Commissioner for Personal Data Protection. The Client can exercise any of the above rights by contacting the Company through email at [dpo@ausprime.eu](mailto:dpo@ausprime.eu) or by post at postal address: 1<sup>st</sup> floor, no. 41, Spyrou Kyprianou Avenue, Steratzias Court, Block B, Apt 102, 4003, Mesa Geitonia, Limassol, Cyprus.

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

If you are not satisfied with our response or believe we are not processing your Personal Data in accordance with the law, you can submit your complain to the Data Protection regulator in your jurisdiction. The Office of the Commissioner for Personal Data Protection in Cyprus is at 1 Iasonos str.,1082 Nicosia. Further information is available on the Commissioner's for Personal Data Protection website [here](#) or by calling them on +357 22818456.



### **Management of personal information**

The Company respects the privacy of any users who access its website(s), and it is therefore committed to taking all reasonable steps to safeguard any existing or prospective clients, applicants and website visitors rights.

The Company keeps any Personal Data of its clients and potential clients in accordance with the applicable data protection laws and regulations.

We may be required to retain and use personal data to meet our legal requirements, for data security purposes and as we believe to be necessary or appropriate in order to: (a) comply with our obligations under applicable law and regulations, (b) respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and governmental authorities, (c) monitor compliance and enforce our Platform terms and conditions; (d) carry out anti-money laundering procedures, sanctions or KYC checks as required by applicable laws and regulations; and (e) protect our rights, privacy, safety, property, or those of other persons.

We have appointed a Data Protection Officer to ensure that the management of personal information is compliant with the applicable data protection laws and regulations and in accordance with this Privacy Policy.

### **Transfer Data outside of EEA**

The Company's aim is to safeguard Personal Data when these are to be transferred outside the European Economic Area. According to the GDPR, Personal Data can be transferred outside the European Economic Area if adequate protective measures are established, appropriate to the safeguards dictated by Data Protection Laws.

The Company takes appropriate protective measures when Personal Data are disclosed to a third party. The third parties that the Company may transmit Personal Data to shall comply with the GDPR or the equivalent legislation in their jurisdictions.

You agree to the transfer and/or processing of your Personal Data outside the European Economic Area, as described in this section, by providing us with your Personal Data during the account opening process and for the maintenance of your account with the Company.

### **Disclosure of your Personal Data**

We disclose and/or share your personal data when it is necessary to provide our services or conduct our business operations. When we share any Personal Data with Third Parties we do so in accordance with applicable data privacy laws.

The Company expressly informs the Third Party regarding the confidential nature of the information. Any personal information is treated as confidential and may be shared within the Company and its partners to meet its contractual and legal obligations. Our company partners maintain the privacy of your information to the same extent the Company does in accordance with this policy. Non-affiliated companies that assist the Company in providing services to you are required to maintain the same level of confidentiality for such information and to use your personal



information only in the course of providing such services that the Company outlines. It is noted, however, that the use of your Personal Data by third parties is not covered by this Privacy Policy and each of these parties are governed by their own privacy requirements and procedures.

As part of using your Personal Data for the purpose set out above, the Company may disclose your personal information to the following Parties:

- Companies within the AC Markets (Europe) Limited Group who provide financial and other services;
- Our third-party providers; we may disclose data to our service providers that we do business with if necessary, and we retain confidentiality agreements with them, and any data we may disclose to them is always on a 'need to know' basis and solely for the provision of our services to you. Such services may include cooperation with financial institutions, such as payment service provider's/credit institutions for facilitating the incoming and outgoing payments of the Clients, fraud prevention agencies, third party authentication service providers, verification/screening service providers, platform providers, cloud hosting services, advertising and data analytics and external consultants.
- Regulatory disclosure; we will disclose any personal data including but not limited to law enforcements and other public authorities, governmental authorities and regulatory bodies, data reporting service providers to meet our regulatory obligations

### Data Security

Safeguarding the privacy of your information and data protection is of utmost importance to us. Whether you interact with us personally, by phone, by mail, over the internet or over any other electronic medium is stored on our secure servers, and where it is protected by our comprehensive, modern, and well-maintained data security infrastructure.

We protect your information by using data security technology that includes, but is not limited to such systems as firewalls, encryption, access controls, physical security, physical and logical network separation, technology audit tools and appropriately administered and monitored internal roles and procedures.

Unfortunately, the transmission of information via the Internet is not completely secure. We will take all reasonable steps to ensure that your personal data are kept secure and protected in accordance with our legal obligations and standards. If this is not possible, for example because we are required by law to disclose data, we will ensure that the sharing of such data is lawful.

### Data retention

The Company needs to comply with the Anti-Money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also, the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept so as the Company is able to demonstrate to the regulator that it has acted in accordance with the legislation. We will retain your personal data for a period of time as we deem necessary for legal and/or business purposes subject to a maximum of seven years upon the end of our



business relationship. Your personal data will be securely deleted and/or destroyed when no longer needed.

### **Cookies**

Internet cookies are small pieces of data sent from our website(s) to your browser and stored on your computer's hard drive when using our site(s), and they may include a unique identification number.

When you visit a website or a page. Cookies allow a website to recognize a user's device.

The purpose of collecting this information is to provide you with a more relevant and effective experience on our website(s), including the presentation of our web pages according to your needs or preferences. By using [www.ausprime.eu](http://www.ausprime.eu) you agree to our use of cookies to enhance your experience. To get more information about our cookie policy and how our cookies work, read our [Cookies Policy](#) uploaded on the company's website.

### **Marketing**

We may collect personal Information through social media sites when you interact with us on one of our social channels, via our Apps or/and from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are connected on social media platforms, as well as from other third parties. We may send you information by SMS, push notification, email, in-app notification or contact you by telephone or by any other means to provide you with information about our products, services, training and offers we think would be of interest to you. If you receive email communications from us about the market or your activity on the platform and don't want to in the future, you may opt out by clicking the unsubscribe link situated at the end of each email sent to you or by notifying the member of staff that contacted you and we will stop sending you this information. If you have any further questions, please do not hesitate to contact us by email at [support@ausprime.eu](mailto:support@ausprime.eu)

### **Changes to Privacy Policy**

The Company reserves the right to change or amend the Privacy policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this policy, we will notify you by email or by means of a notice on our home page or by changing the version of the document including the date of the update which will be visible to the first page of this document. The latest and prevailing version of this Policy will at all times be available at [www.ausprime.eu](http://www.ausprime.eu) Any revised Policy will be immediately effective upon posting on our Web Site.

### **Communication with the Company**

You may exercise any of the above rights by contacting the Company's Data Protection Officer as follows:





- By sending an email to: [dpo@ausprime.eu](mailto:dpo@ausprime.eu) or
- By post at postal address: 1<sup>st</sup> floor, no. 41, Spyrou Kyprianou Avenue, Steratzias Court, Block B, Apt 102, 4003, Mesa Geitonia, Limassol, Cyprus.

