



ProChoice
Χρηματιστηριακή Ατδ

PRIVACY POLICY

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PROCHOICE CHRIMATISTIRIAKI LTD (hereafter the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 228429. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 100/09.

The **Privacy Policy** of the Company applies to existing and potential clients as well as to any visitors of the Company’s website. The Company is responsible to protect the privacy of all personal data that acquires and it is the Company’s responsibility to manage the protection of privacy and the safekeeping of clients’ personal and financial information.

Personal Data Collection

The Company will collect the necessary personal information in order to perform its services and activities. It is the Company’s obligation to create a client’s profile in order to provide its services efficiently based on the client’s requirements and preferences. Hence, the Company will collect and hold clients’ personal data when a client completes an online application for opening a live account or when participating in any other promotion and/or offer that the Company offers through its website.

The Company will only use clients’ personal information in accordance with the international data protection regulations. The Company is registered as a Data Controller with the office of the Commissioner for Personal Data Protection under the Processing of Personal Data Law (Protection of Individuals) Law 138(I)2001 and will process personal data only in accordance with Cyprus data protection legislation.

In accordance with the Company’s regulatory requirements, client’s personal data will be kept on record for a minimum period of five (5) years after the business relationship ends between the Company and the client.

The collection of personal data by the Company includes but is not limited to:

- Personal details (i.e. name, address, contact number and email address);
- Financial information (i.e. estimated annual income, net worth, investment trading experience and investment knowledge);
- Identity Verification Documents (i.e. passport, ID, utility bill, bank statement, and incorporation documents for legal entities including all kind of certificates).

Personal Data Usage

The personal data that the Company obtains may be used for any one or more of the following reasons:

- Verification of the identity of the client;



- Create and maintain client personal file;
- Transmit and execute client orders;
- Assess client suitability to the products and services provided by the Company;
- Provide the client post transaction related services;
- Inform the client of the Company's products and services;
- Assess and improve clients' browsing experience;
- Transmit clients' personal data to third parties for marketing purposes without prior written consent of the client.

Disclosure of Personal Data

The Company may disclose clients' personal data and/or information to the Cyprus Securities and Exchange Commission and/or any other regulatory and governmental body when this is required by the law.

The Company will provide clients' personal data without informing the clients and this is required to do so by law or in good faith that such action is necessary to protect its rights and comply with any court order and/or judicial proceedings, avoid any potential fraud, and, protect and defend its rights and/or properties.

The Company may also disclose clients' personal data to: a)the Company's Introducing Brokers, b)the companies that the Company establishes a business relationship for providing services such as packaging, mailing and delivering purchases, postal mail etc., c)financial institutions and any other similar organizations that are nominated by the client, d)external service providers and professional advisors that provide services to the Company, e)any organization at the clients request or any person acting on behalf of the client, f)any third parties where this is necessary to process a transaction or provide services which the client has requested, and/or, any authority to whom the Company is required to disclose such information by law.

CLIENT RIGHTS

The client is not obliged to provide the personal information that the Company requests, however, the Company may not be able to proceed to the opening of the client's account or provide the client with any other services and/or information that the client may demand.

The client has the right to request any personal data that the Company holds according to the Cyprus Data Protection legislation. This may incur a fee to cover the associated administrative costs.

CLIENT CONSENT

The client hereby gives its consent to such collection, processing, storage, disclosure and use of personal data by the Company.

SECURITY

The Company implements strong measures to protect the security of its clients' personal data and to ensure it is not accessed by any unauthorized persons. The client should not disclose its personal log in details to any third party. In addition, the Company adopts strong security measures to protect the clients' personal data from loss, theft, copying, unauthorized access or disclosure, alteration or destruction. Such security measures include encryption, strong authentication mechanisms and separation of machines and data to implement secure areas.

COOKIES

The Company uses cookies in order to obtain information about its clients' access to the Company's website and other services provided to its clients. For further information all clients should refer to the Company's Cookie Policy. Cookies are small pieces of information which use a unique identification tag and are stored on the clients' devices as a result of using this website or other services provided by the Company. A client who does not wish to receive cookies should change the settings of his browser to refuse all cookies or to be notified anytime cookies appear and have the choice to accept or not. Nevertheless, it is strongly recommended to allow cookies on the Company's website as by turning off cookies it may lead to reduce performance of the Company's website and trading platform and may also impair the quality of the services in relation to clients' trading account

UPDATES AND AMMENDMENTS

The Company has the right to update and amend this Privacy Policy at its discretion and at any time it considers it suitable and appropriate. The Company shall review and amend the current policy at least on an annual basis on the Company's website. The Client is responsible for reviewing regularly this Privacy Policy through the Company's website and after such changes are published the client consent to such changes.

All queries should be emailed to the Company at backoffice@pro-choice.com.cy