

Privacy Policy

Contents

Introduction	4
Consent	4
Contact details	4
Category of personal data	4
What information falls under this category	4
Purpose of processing or legal basis.....	4
Source of the data.....	4
Existence of automated decision making or profiling	4
Statutory obligation or Contractual requirement. Consequence of not providing the data by the client	5
Economic and suitability information.....	5
Category of personal data	5
What information falls under this category	5
Purpose of processing or legal basis.....	5
Source of the data.....	5
Existence of automated decision making or profiling	5
Statutory obligation or Contractual requirement. Consequence of not providing the data by the client	5
Internet Protocol Address.....	6
Category of personal data	6
What information falls under this category	6
Purpose of processing or legal basis.....	6
Source of the data.....	6
Existence of automated decision making or profiling	6
Statutory obligation or Contractual requirement. Consequence of not providing the data by the client	6
Communication recording	6
Category of personal data	6
What information falls under this category	6
Purpose of processing or legal basis.....	6
Source of the data.....	6
Existence of automated decision making or profiling	7
Statutory obligation or Contractual requirement. Consequence of not providing the data by the client	7
Collection & Usage of Personal Information	7

Protection of Personal Information8

Affiliates. Partners and Non-Affiliated Third Parties9

 Within the Group9

 Non-affiliated third parties9

Contacting Clients10

 Client Communications10

 Identify verification via video communications11

Storage11

Erasure of personal data11

Use of "COOKIES". AMP Analytics11

Privacy Policy Updates and Contact12

Introduction

Prodigit Investments Limited (“we”, the “Company”) is responsible for the protection of the privacy and the safeguarding of the personal data of our Clients (potential clients, visitors to our website, professional Clients and/or eligible counterparties, hereinafter “you”). Your privacy is important to us.

This Privacy Policy outlines how we manage the personal data we collect from your use of our services, applications or our website through your interaction with us on social media or your other dealings with us. When doing that we act as data controller in accordance to the principles contained in the Processing of Personal Data (Protection of Individuals) law (L.138(I)/2001, as amended) (the “Law”) which transposed the General Data Protection Regulation (GDPR) (EU) 2016/679. The Company's contact with regards to any queries about Data protection will be the Compliance Department which can be contacted through email on compliance@invest.com.

Consent

Whenever we collect and process your personal data we do this as a data controller and with your explicit consent and for legitimate purposes. Within the categories of internal, external, financial, social and tracking data, the Company collects the following personal data:

Contact details

Category of personal data

Contact and Identity data.

What information falls under this category

First name, Last name, date of birth, address, e-mail, phone number.

Purpose of processing or legal basis

In order for the Company to provide financial services the Company is obligated to attain the contact and identity details from their clients (Know Your Client procedure). In order to comply with The Prevention and Suppression of Money Laundering and Terrorist Financing Laws (L.188(I)/2007) as amended, the company is obligated to retrieve this personal data from the clients.

Source of the data

The data is retrieved during the on-boarding procedure of the client.

Existence of automated decision making or profiling

There is no automated decision making within this category of personal data.

Statutory obligation or Contractual requirement. Consequence of not providing the data by the client

Statutory obligation. If you decide not to provide this data, the agreement between you and the Company cannot be established. It is a regulatory obligation. The collection of your phone number is a contractual requirement.

Economic and suitability information

Category of personal data

Social and Financial data.

What information falls under this category

- a. Economic profile: Employment status; Annual income; Source of income; current value of wealth; annual investment plans; investment objectives;
- b. Tax identification number.

Purpose of processing or legal basis

The economic profile information is requested under the obligation of Part 2 sections 25 and 26 of the Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017, as amended) regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets. In the context of improving international tax compliance with the common reporting standard (CRS) for the automatic exchange of financial account information developed by the Global Forum of the Organisation for Economic Co-Operation and Development (OECD), the Republic of Cyprus signed on 29 October 2014, following a Council of Ministers decision dated October 22, 2014, the Multilateral Competent Authority Agreement for the automatic exchange of financial information of financial accounts. Under this agreement the Company is obligated to require the Tax Identification number of all trading clients.

Source of the data

The data is retrieved during the on-boarding procedure by the client.

Existence of automated decision making or profiling

Automated conclusions are made based on your input in the relevant questionnaires. If the services we offer are not suitable for you we will not be able to provide you with such services.

Statutory obligation or Contractual requirement. Consequence of not providing the data by the client

Statutory obligation. If you decide not to provide this data, the agreement between you and the Company cannot be established. The Company is under a obligation to obtain such information/data

Internet Protocol Address

Category of personal data

Tracking data.

What information falls under this category

IP-address, device id, trading behaviour.

Purpose of processing or legal basis

The purpose for acquiring and tracking the IP address is mainly for anti-fraud reasons. The Company is dealing with important data of clients and has implemented effective anti-fraud systems. These systems use the IP-Address and Device ID to detect potential fraud situations. In order for the Company to provide our customised artificial intelligence service the tracking of the client experience is necessary.

Source of the data

The data is retrieved during the use of the application.

Existence of automated decision making or profiling

The Anti-fraud systems detect possible patterns that can suggest that there could be fraudulent conduct with regards to your account.

Statutory obligation or Contractual requirement. Consequence of not providing the data by the client

Contractual requirement. If you decide not to provide access to this data. Antifraud systems will not be able to function correctly and the risk of being a victim of fraud will increase.

Communication recording

Category of personal data

Communication.

What information falls under this category

Recording of phone calls, e-mails, chats.

Purpose of processing or legal basis

According to Commission Delegated Regulation (EU) 2017/565 of 25 April 2016, the Company shall establish, implement and maintain an effective recording of telephone conversations and electronic communications policy. Firms shall ensure the quality, accuracy and completeness of the records of all telephone recordings and electronic communications.

Source of the data

The data is retrieved during the phone calls, chats and e-mail communications.

Existence of automated decision making or profiling

There is no automated decision making within this category of personal data.

Statutory obligation or Contractual requirement. Consequence of not providing the data by the client

Statutory obligation. If you decide not to provide this data, the agreement between you and the Company cannot be established. It is a regulatory obligation.

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for the Company to process all types of personal data, but it must be explicitly given. Clients consent to the collection, processing, storage and use of personal information by the Company as outlined below when accepting the Company's Privacy Policy. Potential clients will be prompted to consent to the same by accepting this Privacy Policy through means that would allow us to trace and record that such consent has been properly given in the first place.

With regards to our collection and processing of your personal data you have the right to:

1. unconditionally withdraw your consent to the collection, processing, storage and use of personal information by the Company. The client is also allowed to partially give consent to specific collection, processing and storage of personal data. At the time of giving consent you will be given several options to specify your consent. For withdraw of consent please see section 8.
2. Erasure of personal details for non-active clients. The Company is obligated by the Cyprus authorities to keep records of client's details and trades for a minimum period of five (5) years from the end of business relationship with you according to the relevant regulations. (see more in section 6). After this period clients can opt to erase their details.
3. Rectify your personal details on your request.
4. Object to processing after giving the Company consent to collect, process and store your personal data. This may result in ending the business relationship with the Company.

If you want to make use of any of the above rights please contact our compliance department stating your account number and question related to any of the above rights at: [\[email\]](#)

Collection & Usage of Personal Information

The Company may collect the necessary Personal data for any legitimate purpose related to our services, which include, among others, assisting you in opening your trading account, performing transactions, safeguarding your assets and privacy, providing client support, customizing your browsing experience, improving your overall customer experience and ensuring that you are always kept up to date with our latest products and services.

In this respect, the Company gathers information from its clients and potential client and may, in certain circumstances, gather information from banks, agencies and/or other sources which will help the Company to construct its clients' and potential client profiles.

The Company also collects the necessary information to ensure its compliance with the applicable laws and regulations, including any relevant anti money laundry rules and the Foreign Account Tax Compliance Act (FATCA) and the OECD Common Reporting Standard (CRS).

We will not hold any information about your debit or credit cards, or any payment method used by you to make a deposit not required by the Applicable Regulations (as defined in the Company's Terms & Conditions) and will at all times be in compliance with the undertaken cardholder data security standards. For this reason we only work with trusted and regulated Payment Service Providers.

The information the Company collects includes information required to communicate with and identify its clients and potential clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. the Company can also assess trading related information as well as sensitive data, including data concerning criminal prosecutions or convictions.

We may collect information in a form that does not, on its own, allow to identify any specific individual (i.e. not personally identifiable information), including such information as language, zip code, area code, unique device identifier, referrer URL, location, and the time zone. We may collect, use, transfer, and disclose such not personally identifiable information for whatever legal purpose this information may serve as long as it is not traceable to the original owner and therefore not categorised as personal data.

Our website, e-mails and messages may contain data analysis tools which allow us to track receipt of correspondence & messages and to count the number of users that have visited our website or opened our correspondence & messages. Such information is completely anonymized and is not personally identifiable.

Protection of Personal Information

Any personal information provided by you to the Company will be treated as confidential and shared only within the Company and its affiliates and will only be disclosed to a third party taking in account the principle of data minimisation (only the necessary info) or under any regulatory or legal proceedings. In case such disclosure is required to be made by law and/or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the law and/or regulatory authority. Under such circumstances, the Company will expressly inform the third party of the confidential nature of the information. See the

list of third parties in section 4.

Affiliates. Partners and Non-Affiliated Third Parties

The Company does not sell, license, lease or otherwise disclose your personal information to third parties, except as described in this Privacy Policy.

Within the Group

The Company is part of a Group of companies that all have a role in offering a complete service to our clients. For this reason, the Company may share information with its subsidiaries/parent and/or sister companies, including those located outside the European Economic Area (EEA), in the event such information is reasonably required by such entity to provide the services to you. In case any information is provided to such entities outside the EEA, the Company will do so in full compliance with the applicable EU-wide data protection regulations.

The Company may share information with its affiliates, including those located outside the European Economic Area (EEA), in the event such information is reasonably required by such affiliate to provide the services to you. In case any information is provided to affiliates outside the EEA, the Company will do so in full compliance with the applicable EU-wide data protection regulations. The personal data is shared with the following category of affiliates/partners: Globe Invest Ltd. All the mentioned partners only get the minimum amount of personal data in order for them to provide their service to our company and therefore to you.

Non-affiliated third parties

In addition, the Company may engage third parties to carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to its business. The use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant laws & regulations and in a manner similar to the way the Company protects the same.

The Company will not share personal information with third parties which are considered as not being able to provide its clients and potential client with the required level of protection.

The Company will not engage any business introducers and no information will be passed by the Company to such entities.

#	Category	Location	Access	Purpose
1	Payment service providers	EU	Accounting	Payments processing, Antifraud/Risk check System, Application logs for payment system
2	Banks	EU	Accounting Safekeeping department,	Payment requisites, safekeeping of client funds
3	Development	EU	Product managers, Senior management	Review, enhance/update product
4	Customer support	EU	Back office, sales	Customer support automation
5	Storage/Back up	EU	Development	Application for payment system, document/information storage
6	Communication	EU	Sales, management, compliance, back office	Email communication
7	Transaction reporting	EU	Risk, Compliance	Regulatory obligation to report transactions
8	KYC on boarding	EU	Compliance, Risk	Regulatory obligation for due diligence/KYC purposes (Anti-money laundering)

Contacting Clients

Client Communications

From time to time the Company may contact you by email or by telephone or message you and we may keep a record of such communications for quality assurance and any other lawful and legitimate business purposes. The relevant records will be our sole property and you accept that they will constitute evidence of the communications between us and will be kept for as long as necessary to reach the purposes they were initially made for. We will use the phone number and e-mail specified by you during your account opening or any other dealing with us. Any person wishing to opt out of further contact with the Company is entitled to do so at any time. The respective “unsubscribe” link will be provided in the relevant e-mail communications of the Company. To opt out of communications via telephone and messages please email us at backoffice@invest.com.

Identify verification via video communications

The Company may proceed to communicate with you via video for the verification of your identity following the rules applicable to the Company.

Storage

We store the gathered personal information for a minimum period of five (5) years necessary to fulfil the purposes for collecting it in the first place. In any case the gathered information will be stored for a period not less than the one we are required to observe in order to comply with the applicable rules and regulations, namely 5 years with regards to obligations (Directive D144-2007- 08 Of 2012 Part VII Record Keeping Paragraph 31) under the Cyprus Security and Exchange Commission (CySEC) and 6 years with regards Accountancy data obligated by the Cyprus Tax law. The authorities can request a longer period if they deem necessary. If Client has not been actively making use of our financial services for 5 - 6 years (depending on the data), we will remove any details that will identify you or we will securely destroy the records, unless we substantiate why we need the data for a longer period of time.

Erasure of personal data

GDPR Law, Article 17 indicates obligation of data controller to erase personal data by request of the data subject. Being a regulated entity licensed by CySEC, the Company is obliged to follow relevant regulatory requirements, including among others EU AML Law and CySEC AML Directive. Mentioned above article 17 paragraph 3.b defines that the obligation to erase data upon request is not applicable, where there is a contrary obligation to keep the data, imposed by relevant EU or Member State laws. Subject to CySEC AML Directive , Part VII and according to the provisions of the section 68(1) of the EU AML Law, we are obliged to keep personal data of our clients for the period of at least 5 years after the end of the business relationship.

Use of "COOKIES". AMP Analytics

The Company uses cookies and AMP Analytics to secure its clients trading activities and to enhance the performance of its website <https://www.invest.com>.

The cookies used by the Company do not contain personal information or other sensitive information. Data from AMP documents is always IP anonymized.

The Company may share its website s usage statistics with reputable advertising companies and with its affiliated marketing company. It is noted that the information collected by such advertising company is not personally identifiable. To administer and improve its website <https://www.invest.com> the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not

contain any personally identifiable information.

Privacy Policy Updates and Contact

The Company may update this Privacy Policy from time to time. In the event the Company materially changes this Policy including how it collects, processes or uses your personal information, active clients will be notified as provided for in Client Agreement. Potential clients are notified by means of the publication of the updated Privacy Policy on our website <https://www.invest.com>.

The Company encourages you to periodically review this Privacy Policy so that you are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Privacy Policy.

Furthermore, if you have any complaints in relation to the areas discussed above please forward your complaint to us by email. The responsible person for the privacy policy of the Company is the Compliance Officer. You can reach his department by email compliance@invest.com.

As a Client of the Company, you have the right to lodge a complaint at the Cyprus Data Protection Commissioners 'Office:

Email: commissioner@dataprotection.gov.cy

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