

## **Privacy and cookies policy**

### **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

### **2. Collecting personal information**

- 2.1 We may collect, store and use the following kinds of personal information:
  - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - (b) information that you provide to us when registering with our website (including your email address);
  - (c) information that you provide when completing your profile on our website (including your name, date of birth, educational details and employment details, financial information);
  - (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
  - (e) any other personal information that you choose to send to us;

### **3. Using personal information**

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:
  - (a) enable your use of the services available on our website;
  - (b) send statements, invoices and payment reminders to you, and collect payments from you;
  - (c) send you non-marketing commercial communications;
  - (d) send you email notifications that you have specifically requested;
  - (e) send you marketing communications relating to our business;
  - (f) deal with enquiries and complaints made by or about you relating to our website;
  - (g) keep our website secure and prevent fraud.



- 3.3 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.
- 3.4 All our website financial transactions are handled through our payment services provider, EcommPay. You can review the provider's privacy policy at their respective websites. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

#### **4. Disclosing personal information**

- 4.1 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
  - (b) in connection with any ongoing or prospective legal proceedings;
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - (d) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 4.2 Except as provided in this policy, we will not provide your personal information to third parties.

#### **5. International data transfers**

- 5.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 5.2 Information that we collect may be transferred to the countries which do not have data protection laws equivalent to those in force in the European Economic Area.
- 5.3 You expressly agree to the transfers of personal information described in this Section 5.

#### **6. Retaining personal information**

- 6.1 The Company will, as required by Law, retain your Personal Data on record for a period of at least five (5) years, which is calculated after the execution of the transactions or the termination of the business relationship or in case of termination of our business relationship.

## **7. Security of personal information**

- 7.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 7.3 We do not store and maintain your credit/debit card data.
- 7.4 In accordance with the recommendations of Payment Card Industry Security Standards Council your card data are protected using Transport Layer encryption (TLS 1.2). At application level the data is protected by AES algorithm with 256 bit key.
- 7.5 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 7.6 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).
- 7.7 We do not maintain paper

## **8. Amendments**

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **9. Your rights**

- 9.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity.
- 9.2 We may withhold personal information that you request to the extent permitted by law.
- 9.3 You may instruct us at any time not to process your personal information for marketing purposes.

## **10. Third party websites**

- 10.1 Our website includes hyperlinks to, and details of, third party websites.
- 10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **11. Updating information**

- 11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **12. Cookies**

- 12.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 12.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 12.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- 12.4 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.
- 12.5 We use both session and persistent cookies on our website.

### **13. Our details**

- 13.1 This website is owned and operated by **NTFX Capital Ltd**, registered in the Republic of Cyprus under registration number 335293, and our office is at *105 Griva Digeni str., Steides Centre, 1<sup>st</sup> floor, office 101, 3101 Limassol, Cyprus.*
- 13.2 You can contact us by writing to the business address given above, by email to **support@ntfxpro.com** or by telephone on +357-25-281-889.