PRIVACY POLICY

Personal Data Protection

The Processing of Personal Data (Protection of the Individual) Law of 2001

The processing of personal data in Cyprus is governed by the Processing of Personal Data (Protection of the Individual) Law, which entered into force on 23rd November 2001 to address privacy issues arising out of the collection, storage, processing and use of personal data. The Law was amended in 2003 in order to harmonize Cyprus legislation with the Directive of the European Union (95/46) on the protection of individuals with regard to the processing of personal data.

The Law objective is to protect the fundamental rights of individuals (data subjects) whereas to set out specific obligations for those processing personal data (data controllers). Data controllers are the people or body ‘which determines the purposes and the means of processing’ both in the public and in the private sector.

Personal data protection deals with the protection of personal information relating to an individual against unauthorized and illegal collection, recording and further use. It also grants the individual certain rights. i.e. the right of information, the right of access and gives him the possibility to submit to the Office of the Commissioner complaints relating to the application of the Law.

The Law sets out the conditions which data controllers have to ensure for the legal processing of personal data and defines what kind of processing of personal data is allowed. As a general rule, the collection and processing of sensitive data is prohibited, subject to various exceptions. With regard to the notification requirements concerning the operation of a record or the start of processing under the Law, it defines precisely what details the data controller must notify to the Commissioner.

The Law also provides for the right of confidentiality and security of processing. Furthermore, it states the rights of data subjects such as the right of information, the right of access to personal data, which concern them personally, the right to temporary judicial protection and the right to damages. Furthermore, the Law provides for the appointment and the rights and obligations of the Commissioner for the Protection of Personal Data.

One of the most important effects of the Data Protection Law is the obligation imposed on persons who hold personal data to notify the Commissioner in writing of the establishment and operation of a record or the start of processing according to certain rules and subject to some exceptions. Such exceptions apply for example where the processing concerns clients or suppliers of the data subject as long as the data are not transmitted or disclosed to third parties.

Data Protection and the Electronic Communications Law

The Law Regulating Electronic Communications and Postal services of 2004 (the Electronic Communications Law) has been enacted for the purpose of harmonization with certain European Directives, including Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications). It particularizes and complements the provisions of the Law for the Processing of Personal Data and provides for the
protection of the legitimate interests of subscribers of electronic communications networks and services who are legal persons.

The Law applies to the processing of personal data in connection with the provision of publicly available electronic communications services in communications networks in Cyprus. According to section 18 of the Law, the Commissioner of Electronic Communications has an obligation to promote the interests of the citizens of Cyprus and of the European Union by, inter alia, contributing to ensuring a high level of protection of personal data and privacy.

Section 98 of the Law provides for the appropriate technical and organizational measures to be taken by providers of publicly available electronic communications services and networks to safeguard the security of their services and networks. Section 99 provides for the confidentiality of the communications and related traffic data. With regards to traffic data, section 100 provides that such data relating to subscribers and users processed and stored by the provider of a public communications network or publicly available electronic communications service must be erased or made anonymous when it is no longer needed for the purpose of the transmission of a communication.

Sections 101 to 107 contain provisions on location data other than traffic data, the presentation and restriction of calling and connected line identification, automatic call forwarding, directories of subscribers and unsolicited communications. In particular, sections 102, 103 and 104 apply to subscriber lines connected to digital exchanges and, where technically possible and if it does not require a disproportionate economic effort, to subscriber lines connected to analogue exchanges.

**Direct Marketing & Unsolicited Communications**

The Data Protection Law provides that personal data cannot be processed by anyone for the purpose of the promotion, unless the data subject has notified his consent to the person responsible for processing in writing. The person responsible for processing who wishes to carry out the processing of personal data for the above purposes can use his name and surname was well as his address for the purpose of receiving the consent of the data subject, on the condition that such data has been taken from sources which are accessible to the public.

According to the Electronic Communications Law, the use of automated calling systems without human intervention (automatic calling machines) or facsimile machines (fax) or electronic mail or SMS messages for the purposes of direct marketing may only be allowed in respect of subscribers who have given their prior consent. Automated calls for the purposes of direct marketing by any other means than these, are prohibited without the consent of the subscribers concerned.

The aforementioned rights apply to subscribers who are natural persons. Nevertheless, the Commissioner of Electronic Communications, following consultations with the Commissioner for the Protection of Personal Data, has an obligation to ensure, by means of the issuing of an Order, that the legitimate interests of subscribers other than natural persons with regard to unsolicited communications are sufficiently protected.

Notwithstanding the rights of subscribers as described above, where a natural or legal person obtains from its customers their electronic contact details for electronic mail, sms, fax, etc. in the context of a service, the same natural or legal person may use these electronic contact details for direct marketing of its own similar products or services on condition that customers clearly and distinctly are given the
opportunity to object, free of charge and in an easy manner, to such use of electronic contact details when they are collected and on the occasion of each message in case the customer has not initially refused such use.

Just2Trade Online Ltd will process personal data of website users, which will be brought to its attention and will keep a personal data filing system, taking all necessary measures to safeguard the confidentiality of this information. Just2Trade Online Ltd never reveals the said data to third parties, unless, you have expressly consented thereto or it is required by Law and/or competent authorities. The data will be processed by Just2Trade Online Ltd only as expressed by Law in order to carry out its services under MiFID, to this effect the user consents, either expressly for communication purposes or consent is demonstrated solely by use of the website and applies also to any processing of the user’s data by businesses associated with Just2Trade Online Ltd as rendered by the services provided under its license.

Should users of the website choose to follow the special connections (links, hyperlinks, banners) to the websites of third parties, Just2Trade Online Ltd is not responsible for the terms of personal data processing and protection followed by these parties.

Any user/visitor has, in accordance with article 12 of The Processing of Personal Data (Protection Of Individuals) Law 138(I)/2001, right of access to personal data that concern him/her. Furthermore, the website user has the right to object (which includes the right of rectification) to the processing of personal data that concern him/her. The aforementioned rights are exercised via the submission of a written application to the Data Controller of the Company.

Information collected

When you sign up for a demo or live account with Just2Trade Online Ltd, the following information about you (“Your Data”) will be collected and stored by Just2Trade Online Ltd for administrative purpose, purpose of provision of services by Just2Trade Online Ltd and/or legal purposes:

- Personal information, such as names, addresses, personal registration number, job and e-mail
- addresses etc (“Personal Information”)
- Financial information (“Financial Information”) economic profile
- demographic information such as postcode, preferences and interests
- other information relevant to customer surveys and/or offers.

What do we do with the information we gather?

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional email about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
• From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize the website according to your interests.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

How do we use cookies?

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us to analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Personal Information is collected when our users provide personal information to us upon registering for membership or when applying on-line for an account.

Disclosure of personal data
Your Data is stored and kept by Just2Trade Online Ltd confidentially according to the legislation on protection of personal data and processing thereof applicable in the jurisdiction in which Just2Trade Online Ltd is located, as further explained below under “Disclosure of Personal Data”.

Just2Trade Online Ltd may not pass on or use any of your data without valid legal grounds.

Your personal data will only be disclosed by Just2Trade Online Ltd to third parties such as administrative or judicial authorities if Just2Trade Online Ltd is compelled to do so pursuant to the applicable law, or if you have given your written consent to such disclosure. You may revoke such consent or modify its extent at any time.

Without prejudice to the above, Just2Trade Online Ltd can disclose the following information:

- General customer data, such as name, address and personal registration number, to companies carrying out administrative tasks for Just2Trade Online Ltd
- General customer data about corporate customers to financial institutions subject to professional secrecy, for the purpose of marketing and advisory services.

**Insight**

In accordance with the provisions of the Data Protection Directive (officially Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data), any Just2Trade Online Ltd’s customer has a right to be informed about the data that Just2Trade Online Ltd holds about him/her/it. You may request details of personal information which we hold about you. A small fee will be payable. If you would like a copy of the information held on you please write to info@just2trade.online.

**How to correct your information with Just2Trade Online Ltd**

If you believe that any information about you we are holding is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

Just2Trade Online Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from February, 2017.