

## **Constance Investment Ltd. Privacy Policy**

Constance Investment Ltd. is a Cyprus-based investment investment firm (CIF) licensed under the Cyprus Security and Exchange Commission (CySEC) for the management of investment portfolios, and brokerage services for retail and professional clients, as well as eligible counterparties. The company is operating in the European Union.

Constance Investment Ltd.

[www.constancei.com](http://www.constancei.com)

88 Arch. Makarios Avenue, 5<sup>th</sup> Floor, 1077, Nicosia, Cyprus

[dpo@constancei.com](mailto:dpo@constancei.com)

Tel. +357 22 028 023

At Constance Investment Ltd. we respect the confidentiality of our clients' personal information and thus we are committed to ensuring the security of any information Constance Investment Ltd. is provided with by our prospective and / or existing clients as well as by visitors of our corporate website [www.constancei.com](http://www.constancei.com), i.e. through this website. This code of confidentiality applies for any further information a new client or respectively an existing client provides Constance Investment Ltd. within the course of electronic and physical correspondence with Constance Investment Ltd.

### **Collection of Personal Information**

In order to provide regulated financial services to our clients efficiently and accurately, when each new client applies to register to use our regulated services, we ask of them to submit certain personal information to Constance Investment Ltd. during the client's assessment and Due Diligence procedure, as well as during the process of the Appropriateness Test and / or Suitability Analysis. For regulatory compliance, this may include client's full name, date of birth, home and work addresses and telephone numbers, email address, passport number/or ID number, marital status, government issued photo ID with signature, financial information such as estimated annual income, net worth, liquid assets, previous trading experience and risk tolerance. The disclosure of the information as mentioned within this paragraph to Constance Investment Ltd. is to be submitted willingly by the prospective and / or existing client.

Besides the above, we may also gather certain information about the clients' use of our services. This may include information from which they can be identified such as the times they log on (for instance, IP address, type of computer or telecommunication device used for accessing our corporate website, geographical location and internet access service provider of an individual visitor), their volume of use of our corporate website, the types of data, systems and reports they access, duration of sessions and other similar data. This data as described in this paragraph is collected automatically by the IT infrastructure of Constance Investment Ltd.

Furthermore, Constance Investment Ltd. collects personal information, which is related to an individual visitor of our corporate website by the use of the contact form in the 'contact us' section of our corporate website.

At Constance Investment Ltd., incoming and outgoing telephone calls may be recorded for training and monitoring purposes.

Constance Investment Ltd. fulfils the role of the Data Controller of all data that the company collects from individual visitors of our corporate website as well as from our prospective and / or existing clients in line with the requirements of the Data Protection Regulation 679/2016/EU.

### **Uses Made Of Your Personal Information**

We gather information in order to allow us to administer, support, and obtain feedback on our services, to identify and prevent faults with our services and the Site, to improve the services offered by us, to ensure we are maintaining adequate security measures, to prevent any security breaches of our Site, and

to keep clients informed of products and services that may be of interest to them. We may also use this information, for research and analysis purposes such as monitoring website usage in order to help us develop the Site and improve our services.

We at Constance Investment Ltd. also collect and process information as described in here above as to enable us to maintain regulatory and legal compliance when rendering regulated financial services to our clients. This concerns in particular the identification of a prospective and / or existing customer when making use of the regulated financial services offered by Constance Investment Ltd.

All use and processing of personal data, which relates to an individual visitor of our corporate website is subject to that person's explicit consent. Also, the use and processing of personal information and data, which relates to a prospective and / or existing client of Constance Investment Ltd. is strictly limited to the use as described within this privacy policy and subject to that prospective and / or existing client's explicit consent.

### **Further Uses Of Your Personal Information; Marketing**

In addition, we may process your personal data for marketing purposes and there are several ways in which we at Constance Investment Ltd. may use the personal information you have provided to us, including the following:

- We may contact you in order to present to you services to which you do not subscribe and which may be of interest to you according to your profile;
- We may wish to provide you with information about special features of our Site that we think may be of interest to you;
- We may provide you with information from our affiliates which we think may be of interest to you;
- We may invite you to client functions or entertainment events; and
- The above contacts may be via email, fax, post and/or telephone.

If you do not want us to use your personal information in this way, as an on-line subscriber, you may update your account to amend your marketing preferences at any time. Constance Investment Ltd. has appointed a Data Protection Officer (DPO). This DPO remains independent within our corporate structure and has a direct connection to the top level management at Constance Investment Ltd. By submission of electronic correspondence to [dpo@constancei.com](mailto:dpo@constancei.com), you can get in touch with our DPO and submit your request with regards to your personal information.

### **Your Rights to your personal data**

In line with the provisions and requirements of the Data Protection Regulation 679/2016/EU on the protection of personal data, you remain the following rights to your personal data:

- You remain the right to review all personal information, which is related to you and which was / is collected during your visit of our corporate website and during the use and processing as described in this privacy policy at any time and to check the accuracy of personal data, which is related to you individually.
- You remain the right to have done corrections, rectifications and refreshments to your personal data.
- You remain the right to have your personal data deleted partly or completely.
- You remain the right to obtain information on the use and purpose to process your personal data.
- You remain the right to limit the purpose for processing and use of your personal data. However, this

may have an effect on the accessibility of our regulated financial services rendered to you. You can refer to our DPO and our Compliance Department for further clarifications on this.

- You remain the right to opt-out from commercial and non-commercial newsletters and notifications from Constance Investment Ltd. by notification to our DPO accordingly.

- You remain the right to have all personal data, which is related to you and which is or had been collected during your visit and use of our corporate website and during your correspondence with Constance Investment Ltd., being transferred to another Data Controller nominated by you.

- You remain the right to withdraw your previously given explicit consent with regards to the collection, use and processing of your personal data at any time by contacting our Data Protection Officer by electronic mail services to [dpo@constancei.com](mailto:dpo@constancei.com).

You can submit your request to make use of the above rights to your personal data by contacting our Data Protection Officer (DPO) through electronic mail services to [dpo@constancei.com](mailto:dpo@constancei.com).

### **Disclosure of your information**

We will not without your consent disclose to third parties any individually identifying information, such as names, postal and e-mail addresses, telephone numbers, or other, which you have provided to Constance Investment Ltd.

The rendering of regulated financial services to our company's prospective and / or existing clients requires the disclosure of personal data related to our prospective and / or existing clients in order to fulfil requirements defined by the regulatory legal framework in the Republic of Cyprus. Hence, we may pass on information related to our prospective and / or existing customers to third parties such as our professional and legal advisors, administrators or subcontractors. Constance Investment Ltd. ensures the confidentially treatment of all disclosed data to external parties. You remain the rights to your personal data as described within this privacy policy.

Personal data, which is collected during the visit of our corporate website and by the use of the contact form in the 'contact us' section of our corporate website may be disclosed to licensors of the software used on the Site. Please refer to our Data Protection Officer (DPO) in case you have questions on this or in case you want to make use of your rights related to your personal data as described in this privacy policy.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Site Terms and Conditions. Furthermore, your personal data is permitted to be disclosed to public bodies only in cases where the disclosure concerns matters of national and/or international security, the prevention or investigation of criminal activities, law enforcements, where a public interest is given, a juridical proceeding against the person, to which the personal data is related is pending or had been initiated or completed before and/or the personal security of the individual to which the personal data is related.

Constance Investment Ltd. will communicate the use of your personal data to you prior to its use or processing as described in this privacy policy.

### **Your consent**

By submitting your information either through our corporate website [www.constancei.com](http://www.constancei.com) or by electronic or physical correspondence with Constance Investment Ltd., you consent to the use by Constance Investment Ltd. of that information, as set out in this policy. By accessing and using this you are acknowledging that you have read, understood and agree with this privacy policy. We reserve the right to change our privacy policy from time to time and will update this page accordingly. Please

review our policy as often as possible – your continued use of the Site will signify that you are made aware of any such changes.

The Site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies or the content of external websites from legally and economically independent entities. Please check these policies before you submit any personal data to these websites.

### **How we protect your information**

Constance Investment Ltd. takes responsible to store your information in its protected physical archives and protected electronic databases for reference in order to answer queries or resolve problems, provide improved and new services and to meet any legal data retention requirements and regulatory compliance requirements. This means we may retain your information after you stop using the Site or our services or otherwise interacting with us over the applicable time period of five years, starting by the date you terminate your relations with Constance Investment Ltd.

All electronic information you provide us with is stored on secure and protected servers. The transmission of information via the internet is secured using Secure Socket Layer (SSL) technology with high security 128bit encryption. Once we have received your information, we strictly follow these procedures and security features in order to prevent unauthorized access.

### **Failure to Provide Personal Information**

You have a choice to supply any or all of the personal information required. However, missing information may result in Constance Investment Ltd. being unable to open or maintain your account and /or to provide you with our services.

If you feel the rights to your personal data had been infringed by Constance Investment Ltd., please get in touch with our DPO at [dpo@constancei.com](mailto:dpo@constancei.com)