



PRIVACY AND DATA PROTECTION POLICY

The purpose of the present Privacy Policy (hereinafter the “**Policy**”) is to provide information on the collection, process and security of the data transmitted to and collected by the Company (hereinafter “**we**”, “**us**”, or “**our**”) via the use of our trading application, PROfit App (hereinafter the “**App**”) by any end-user of the App, as per our legal obligations under the applicable data protection law. We are committed to taking all reasonable steps in protecting any personal data we receive and collect from you, from misuse, loss or unauthorised access.

The Company is the proprietary owner and distributor of the App and is committed to protecting the end-user’s privacy by safeguarding the end-user’s personal information entrusted to the Company while using our App for Windows, iOS and Android.

Definitions

“**Company**”: means Naxex IP Limited (registration number HE321432) registered address at Archbishop Makarios III, 74 “AMARANTON COURT”, 3rd Floor, Mesa Geitonia, 4003, Limassol, Cyprus

“**Consent of the Data Subject**”: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

“**Controller**”: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

“**Personal Data**”: means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular

by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Processing**”: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Processor**”: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

“**Restriction of Processing**”: means the marking of stored personal data with the aim of limiting their processing in the future.

1. COLLECTION AND USE OF INFORMATION

1.1. We generally collect information that:

- (a) you directly provide us via our App or upon your request regarding the App; and
- (b) we receive from the use of our App.

We may collect your personal information through the download and use of our App, for any or all of the following purposes:

- (a) performing obligations under a contract or in the course of or in connection with our provision of the goods and/or services requested by you;
- (b) where you have provided your explicit consent, to send you marketing information, including but not limited to surveys and questionnaires, about our products or services;
- (c) complying with any applicable laws, regulations, codes of practice, guidelines, directives or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;



- (d) any other purposes for which you have provided the information;
- (e) transmitting information to any affiliated third parties, including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Europe or no EU jurisdictions, for the aforementioned purposes in this section;
- (f) any other incidental business purposes related to or in connection with the above;
- (g) update, fix errors, administer and improve the features and functionality of our applications and associated services;
- (h) to analyse application performance via collection of statistical data.

1.2. The purposes listed in the above clauses is not exhaustive and may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you or other lawful purposes).

1.3. We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we may be subject to, or in order to protect your vital interests or the vital interests of another person.

1.4. The App is provided by the Company in collaboration with companies that provide financial services which are business associates of the Company (hereinafter the “**Associates**”) for the purpose of providing the end-user with their online financial investment services, such as handling the processing and execution of orders and requests, publication of related information in the App, performing statistical analysis on the use of the applications and the aforementioned services. These Associate will be given access to your information as is reasonably necessary to deliver their services, and we will require that such third parties comply with the terms of this Policy or operate under a similar policy.

1.5. When you voluntarily disclose your personal information in your profile, on forums and comment online in forum /chat areas, it becomes publicly available and can be viewed by other users. Forums, chats, and other areas of the community of users of our applications, that are available through Windows, Google Store or Apple Store. In such areas, you should not disclose any information that can be used to establish your identity or the identity of any other person. We are not responsible for the security and protection of information disclosed by you in such areas.

2. MINOR'S PERSONAL INFORMATION AND PRIVACY

2.1. We recognize the importance of protecting the information about minors and we do not knowingly collect any personal information from minors under eighteen (18) years of age. Our App is directed to persons over eighteen (18) years of age, the Company accepts no responsibility for any failure to comply with this requirement.

2.2. We encourage parents and legal guardians to take the appropriate measures to prevent children under eighteen years of age from viewing and using the App without the appropriate permission.

2.3. In the event that Company becomes aware and/or by the request of our Associates, that we have received personal information from a user under eighteen (18) years of age, we shall restrict access to the App and shall delete such information as soon as reasonably practicable and not make use of such information.

3. COLLECTION OF OTHER INFORMATION

We may collect other non-personal information about the use of our App, including but not limited to, components that you have clicked, information you have downloaded (where applicable), as well as other actions related to the use of our App. We may also collect certain technical information necessary for the operation and update of our App and the



collection of anonymous statistics on the use of the App, along with any error reports about our products.

4. PROTECTION OF PERSONAL DATA

- 4.1. We shall use our best endeavours to ensure protection of the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against any accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls.
- 4.2. In order to ensure the security of personal data during processing, we take the necessary organizational and technical measures to protect such personal data against unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as other unlawful acts regarding personal data. Nonetheless, we cannot guarantee that misuse of your personal information by infringers will not occur.
- 4.3. Notwithstanding the above, no method of transmission over the App and over the internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us.

5. RETENTION OF PERSONAL DATA

We may retain data for different periods of time for different purposes as required by statute, our legitimate interests or best business practices. Other statutory obligations, legal processes and

inquiries may also necessitate the retention of certain data.

6. DATA TRANSFERS OUTSIDE THE EEA

We may have processors in different countries around the world and thus your personal data may be processed, used or transferred outside the EEA. In such case, we ensure that all necessary safeguards and security measures are in place, as deemed appropriate, under the relevant national, international laws.

7. CHANGES TO THIS PRIVACY AND DATA PROTECTION POLICY

We reserve the right to revise and update this Privacy and Data Protection Policy from time to time in part or in full by notifying you via email the new version. To view the latest version of our Privacy Policy, click the Privacy and Data Protection Policy link found on the App's documents. In case of any changes, replacement or amendments to this Policy, the new version of the Policy shall become effective on the date the notification of the changes, unless it is otherwise provided by the revised version.

8. END-USER'S RIGHTS

- 8.1. In accordance with the applicable privacy international laws and regulations, the End-users under certain circumstances, have the following rights:

Right to access: You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

Right to rectification: You have the right to request to have any inaccurate personal data about you rectified and, taking into account the



purposes of the processing, to have any incomplete personal data about you completed.

Right to erasure: In some circumstances you have the right to request the erasure of your personal data if established that the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw permission to authorization-based processing; you object to the processing under certain rules of applicable data protection law and if established that the personal data has been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation or for the establishment, exercise or defence of legal claims and for reasons of public interest.

Right to restrict processing: In some circumstances you have the right to restrict the processing of your personal data, for example when you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data and we will only process it for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to object to processing: You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is necessary for the performance of a task carried out in the public interest or in the exercise of any official authority vested in us or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will

cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

Right to data portability: You have the right to request the transfer of your personal data to you or to a third party: Upon your request we can provide you with your personal data or provide these to a third party you have chosen

Right to complain to a supervisory authority: If you consider that the processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

Right to withdraw authorization: To the extent that the legal basis for our processing of your personal information is authorization, you have the right to withdraw that authorization at any time in which case we may not be able to provide to you some of the features and functionality of our Services. Withdrawal of permission will not affect the lawfulness of processing prior to the withdrawal request.

9. NOTIFICATION OF BREACHES

In the event of unauthorized breaches or intrusions into our systems, that may affect your personal data security, we will notify you as soon as it is practically feasible and we will take all necessary measures and actions to avoid future occurrences and similar phenomena.

10. ACCEPTANCE OF THESE TERMS:

By clicking "Accept" on the Privacy Policy checkbox and/or by continuing using the App, you consent to the content of this Policy; including but not limited to, the transfer of any



personal information to the Associates, the relevant authorities, if obliged and you warrant that all data and information provided by you is accurate and up-to-date. By using the App, you are also agreeing to all such terms and conditions provided for in this Privacy Policy. You agree to waive all rights to holding the Company liable for any claim arising out of, or in connection with the processing of your data, as mentioned herein, unless such data has been fraudulently or negligently processed, as against the terms laid down in this Privacy Policy. If you have any queries in relation to your information held by us, do not hesitate to contact us from the contact details provided on the App.

11. CONTACT US

Should you have any queries in relation to this Privacy Policy, your personal data held by us, or any other general questions in relation to the Company and the App, do not hesitate to contact us through the contact details provided on the App.

April 2022