

Registered address:

Themistokli Dervi, 5, Elenion Building, 2nd Floor, P.C. 1066, Nicosia, Cyprus

Tel: +357 22555800 Fax: +357 22555 803/4

Administration office:

3 Themistocles Dervis Street, Julia House, 4<sup>th</sup> Floor, 1066 Nicosia, Cyprus

*Tel:* +357 22 681988 *Fax:* +357 22 681505

## **Privacy Notice for Subscribers**

This privacy notice is issued by Alfa Capital Holdings (Cyprus) Limited (hereinafter, 'ACC', the 'Company', 'we', 'us', or 'our') and it concerns natural persons who sign up with Alfa-Forex, the forex brand owned and operated by ACC (together, the 'subscriber', 'you', or 'your'). This privacy notice contains information about the personal data we collect from you, how we use this data, what do we do with the data we collect and your rights under applicable legislation. ACC is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 ('GDPR') and any applicable data protection laws or regulations of the Republic of Cyprus. We act as a controller of the personal data we collect from you.

#### Who are we?

ACC is a licensed investment firm, registered in Cyprus under registration number HE78416 and regulated by the Cyprus Securities and Exchange Commission ('CySEC') under license number 025/04. ACC's registered office address is at 5, Themistokli Dervi, Elenion Building, 2nd floor, 1066, Nicosia, Cyprus.

If you have any questions or concerns relating to the processing of personal data by ACC, you can contact our Data Protection Officer by email at: GDPR\_dpo@alfacapital.com.cy or by letter to 3, Themistoklis Dervis Street, Julia House, 4th floor, 1066, Nicosia, Cyprus.

# What personal data do we collect?

At the first step of the registration procedure and for the purpose described in the next paragraph, we ask you for your country of citizenship, first name and last name, your mobile phone number and your email address.

### Why do we collect this data?

We use the data we collect from you to send you our newsletters, which contain information about our products and services, promos and latest information about ACC and Alfa-Forex. We ask for your consent to use your data for the purpose described hereinabove.

#### What do we do with your data?

Your data is stored in our database and might be shared with other entities within the Alfa Group or service providers of ACC (i.e. companies who assist us with the effective provision of our services by offering technological solutions and support). We will not use your data to make any automated decisions that might affect you.

### How long do we keep your data for?

Your data is kept for as long as we have your consent.

#### Children's data

ACC does not provide any services to children, nor processes any personal data in relation to children, where 'children' are individuals who are under the age of eighteen (18).

# Your rights

Under applicable legislation, you have the right to request access to, or copies of your personal data, the right to request the correction of any inaccurate personal data concerning you, to request erasure of your personal data, to request restriction of processing of your personal data and to withdraw your consent to the processing of your



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personal data for the purpose described hereinabove. You can withdraw your consent by contacting our Customer Support service at <a href="Support@Alfaforex.com">Support@Alfaforex.com</a>, tel. +35722470969 or our Data Protection Officer at <a href="GDPR\_dpo@alfacapital.com.cy">GDPR\_dpo@alfacapital.com.cy</a>. You also have the right to lodge a complaint regarding the processing of your personal data by us. You can lodge your complaint by completing our complaints form. If you feel that your concerns have not been adequately addressed by us, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus. You can find information about submitting a complaint on their website (<a href="http://www.dataprotection.gov.cy">http://www.dataprotection.gov.cy</a>).

## **Privacy Policy**

As soon as you become a client of ACC, all the provisions of the <u>Privacy Policy</u> of ACC will be applicable for you. You are advised to read this policy carefully, as it provides useful information on key areas such as the categories of personal data that we collect from our clients and process and the purposes of that processing, the legal basis for the processing of our clients' personal data, the recipients or categories of recipients of our clients' personal data, the principles relating to the processing of personal data and a full list with our clients' rights under applicable legislation and an explanation of how those rights can be exercised.