

Lykke Cyprus Privacy Statement

Lykke Cyprus Ltd, is committed to protecting your privacy and handling your data in an open and transparent manner. The personal data that we collect, and process depends on the product or service requested and agreed in each case.

This privacy statement:

- provides an overview of how the Company collects and processes your personal data and tells you about your rights under the local data protection law and the EU General Data Protection Regulation ('GDPR'),
- is directed to natural persons who are either current or potential customers of the Company, or are authorized representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or potential customers,
- is directed to natural persons who had such a business relationship with the Company in the past,
- contains information about when we share your personal data with other third parties (for example, our service providers).

In this privacy statement, your data is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing” such personal data.

For the purposes of this statement, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number.

1. Who we are

Lykke Cyprus Ltd, (the “Company”), registered at 182, Ayias Filakseos Street, Kofteros Business Center, CY-3083 Limassol. For more information please call XXXXXX or visit www.lykke.com.cy

INFORMATION REGARDING THE COMPETENT AUTHORITY

The Company is authorised and regulated by the Cyprus Securities and Exchange Commission, 27 Diagorou Str. CY-1097 Nicosia.

2. What personal data we process and where we collect it from

We collect and process different types of personal data which we receive from our customers via our website/platform, in the context of our business relationship.

We also collect and process personal data from our services providers such as World Check and/or Lexis Nexis and/or KYC Spider Check which we lawfully obtain, and we are permitted to process.

If you are a prospective customer, or a non-customer counterparty in a transaction of a customer (e.g. account or payment authorization (by SWIFT or not) and over-the-counter transactions) or prospective security provider (e.g. a guarantor for a credit facility) or an authorised representative/agent or beneficial owner of a legal entity or of a natural person which/who is a prospective customer, the relevant personal data which we collect may include:

Name, address, contact details (telephone, email), identification data, EU basic payment account identification, birth date, place of birth (city and country), marital status, employed/self-employed, if you hold/held a prominent public function (for PEPs), FATCA / CRS info, authentication data [e.g. signature].



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When we agree to provide products and services to you or the legal entity you represent or beneficially own, then additional personal data will be collected and processed which may include:

In the context of providing banking facilities

Current income, employment history, property ownership, personal investments and investment income, tax residence and tax ID, residence or work permit in case of non-EU nationals, employment position [e.g. as per corporate certificates of directors/shareholders].

For individuals the Company will request personal data disclosing their economic and financial background.

Investment and interest rate and currency products and services

Specific information which we may request includes: knowledge and experience with shares, funds and interest rate/currency products (e.g. for MiFID services), investment strategy and scope, personal investment portfolio, personal objectives.

3. Whether you have an obligation to provide us with your personal data

In order that we may be able to proceed with a business relationship with you, you must provide your personal data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations. We are furthermore obligated to collect such personal data given the provisions of the money laundering law which require that we verify your identity before we enter into a contract or a business relationship with you or the legal entity for which you are the authorized representative / agent or beneficial owner. You must, therefore, provide us at least with your identity card/passport, your full name, place of birth (city and country), and your residential address so that we may comply with our statutory obligation as mentioned above.

Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

4. Why we process your personal data and on what legal basis

As mentioned earlier we are committed to protecting your privacy and handling your data in an open and transparent manner and as such we process your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

A. For the performance of a contract

We process personal data in order to perform and offer our financial services based on contracts with our customer but also to be able to complete our acceptance procedure so as to enter into a contract with prospective customers.

The purpose of processing personal data depends on the requirements for each product or service.

B. For compliance with a legal obligation

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements, e.g. the Money Laundering Law, the Cyprus Investment Services Law, Tax laws, Law on Deposit Guarantee and Resolution of Credit and Other Institutions Scheme, Payments Law. There are also various supervisory authorities whose laws and regulations we are subject to e.g. Cyprus and Securities Exchange Commission. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

C. For the purposes of safeguarding legitimate interests

We process personal data to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.



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D. You have provided your consent

Provided that you have given us your specific consent for processing then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

5. Who receives your personal data

During the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Company. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with the Company by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

Under the circumstances referred to above, **recipients of personal data may be**, for example:

- Supervisory and other regulatory and public authorities, since a statutory obligation exists. Cyprus Securities Exchange Commission, the income tax authorities, criminal prosecution authorities,
- For our anti-money laundering process, such as credit reference agencies,
- External legal consultants,
- Auditors and accountants,
- Marketing operations,
- Fraud prevention agencies,
- Companies who assist us with the effective provision of our services to you by offering technological expertise, solutions and support and facilitating payments

6. Transfer of your personal data to a third country or to an international organisation

Your personal data may be transferred to third countries [i.e. countries outside of the European Economic Area] in such cases as e.g. to execute your payment or investment orders or if this data transfer is required by law [e.g. reporting obligation under Tax law] or you have given us your consent to do so. Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

7. To what extent there is automated decision-making and whether profiling takes place

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), to enter into or perform a contract with you.

8. How we treat your personal data for marketing activities and whether profiling is used for such activities

We may process your personal data to tell you about products, services and offers that may be of interest to you or your business.



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We study several information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time Company's Support Team.

9. How long we keep your personal information

We will keep your personal data for as long as we have a business relationship with you.

Once our business relationship with you has ended, we keep your data for up to five (5) years in accordance with the directive of the Cyprus Securities and Exchange Commission.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory or technical reasons.

10. Your data protection rights

You have the following rights in terms of your personal data we hold about you:

- **Receive access to your personal data.** This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction [rectification]** of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to erase your personal data where there is no good reason for us continuing to process it.

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling since it is related to direct marketing.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name.

Withdraw the consent that you gave us with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact our Customer Support Team at support@lykke.com.cy.

We endeavor to address all your requests promptly.

11. Right to lodge a complaint

If you have exercised any or all your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by completing our Complaint Form that you can find in our website lykke.com.cy.

12. Changes to this privacy statement

We may modify or amend this privacy statement from time to time.



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We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

13. Cookies

Our website uses small files known as cookies to make it work better in order to improve your experience.

Note:

The General Data Protection Regulation (EU) 2016/679 shall apply from 25 May 2018. Until then, the Processing of Personal Data (Protection of Individuals) Laws 2001 till 2012 remain in force.



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