



PRIVACY POLICY

LYKKE CYPRUS LTD

April 2018

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1. Introduction

Lykke Cyprus Ltd (Reg. HE 362443) with head office address at Kofteros Business Center, Ayias Fylaxeos 182, Office 103, 1st Floor, 3083, Limassol, Cyprus, is a Cypriot Investment Firm incorporated and registered under the laws of the Republic of Cyprus, which is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) with License Number 363/18.

Lykke Cyprus Ltd and its related entities (hereafter “the Company”), are responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

2. The collection of personal information

The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from (prospective) clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively.

The information the Company collects includes information required to communicate with and identify its clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.

3. Usage of personal information

The Company will use, store, process and handle your Data in accordance with the Processing of Personal Data (Protection of the Individual) Law of 2001, as amended or replaced from time to time.

The Company uses clients’ personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes.

If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following website: www.lykke.com.cy.

4. Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and will not be disclosed to any third party except in the circumstances mentioned in the below sections.

5. Affiliates and Partners

The Company may share information with affiliates or any other company in the same group of the Company in the event such information is reasonably required in order to provide the products or services to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs, and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.

6. Non-affiliated third parties

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described below:

- a) Where required by law or a court order by a competent Court; in case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority;
- b) Where requested by CySEC or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients;
- c) To relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- d) To such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services;
- e) To credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
- f) To the Company's professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- g) To other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement;
- h) To third parties engaging with the Company to help carry out certain internal functions such as account processing, fulfillment, client service, or other data collection activities relevant to the Company's business;
- i) To credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients;
- j) To a Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs)(EMIR);
- k) To other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form;
- l) To market research call centers that provide telephone or electronic mail (e-mail) surveys with the purpose to improve the services of the Company, in such a case only the contact details data will be provided;



- m) Where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority;
- n) At the Client's request or with the Client's consent;
- o) To permitted successors or assignees or transferees or buyers, with fifteen (15) Business Days prior written notice to the Client;
- p) Client Information is disclosed in relation to US taxpayers to the Inland Revenue in the Republic of Cyprus, which will in turn report this information to the Internal Revenue Service (IRS) of the U.S. according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between the Republic of Cyprus and the U.S.

Client information is disclosed in compliance with the common reporting standard (CRS) for the automatic exchange of financial account information developed by the Global Forum of the Organization for Economic Co-Operation and Development (OECD); in the cases where your tax residence is located outside Cyprus, the Company may be legally obliged to pass on the information and other financial information with respect to your financial accounts to Cyprus tax authorities and they may exchange this information with tax authorities of another jurisdiction or jurisdictions pursuant to intergovernmental agreements to exchange financial account information. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner like the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

7. Recording of Telephone Conversations and Electronic Communications

Telephone conversations and electronic communications between the client and the Company will be recorded and kept by the Company for a period of up to seven years and recordings will be the sole property of the Company. The client accepts such recordings as conclusive evidence of conversations so recorded. Such recordings shall be provided to the client upon request.

8. Contact Clients

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company's contract for differences trading. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company at support@lykke.com.cy and requesting that no further contact on behalf of the Company be made.



9. Restriction of responsibility

The Company is not responsible for the privacy policies or the content of sites to which www.lykke.com.cy links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

10. Use of "COOKIES"

The Company uses cookies to secure clients' trading activities and to enhance the performance of the lykke.com.cy web site. Cookies used by the Company do not contain personal information or other sensitive information.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the lykke.com.cy web site, the Company may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

11. Mailing list

When the Client opens a trading account with the Company he agrees to joining the Company's mailing list in order to receive company news, product updates, and analysis & research updates. If the Client wishes to unsubscribe from the mailing list, he must inform the Company in writing via sending an email to support@lykke.com.cy.

12. Record Keeping

Under Applicable Regulations, the Company will keep records containing Client personal data, trading information, Client's Trading Account(s) opening documents, communications and anything else which relates to the Client for at least five (5) years after termination of the Agreement.

13. Privacy Policy Updates

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded in the Company's website. In this respect, the Company shall send any new version of the present Policy to its existing clients for their further acceptance, every time a change is affected.