PRIVACY POLICY

Data Protection and GDPR Compliance

NIHAO CARBON CERTIFICATES

Version 1.0
Effective Date: January 1, 2024
Classification: CONFIDENTIAL

1. Data Controller

Nihao Carbon Certificates [LEGAL ENTITY], registered at [ADDRESS], is the data controller responsible for your personal data.

2. Data We Collect

- **Identity Data:** Name, date of birth, nationality, ID documents
- **Contact Data:** Address, email, telephone
- **Financial Data:** Bank details, transaction history, source of funds
- **KYC Data:** Verification documents, beneficial ownership information
- **Technical Data:** IP address, login data, browser type
- **Trading Data:** Orders, positions, trading history

3. Legal Basis for Processing

- **Contract Performance:** To provide our services under the Client Agreement
- **Legal Obligation:** To comply with AML/KYC, MiFID II, and tax reporting requirements
- **Legitimate Interest:** To manage our business, prevent fraud, and improve services
- **Consent:** For marketing communications (where applicable)

4. Data Sharing

- Regulatory authorities (National Competent Authority, FIU)
- Trading venues and clearing houses
- EU ETS Registry administrators
- Service providers (IT, KYC verification, auditors)

5. International Transfers

Where data is transferred outside the EEA, we ensure appropriate safeguards (Standard Contractual Clauses, adequacy decisions).

6. Data Retention

Personal data retained for 5 years after end of client relationship, or longer where required by law.

7. Your Rights

- **Access:** Request copies of your personal data
- **Rectification:** Request correction of inaccurate data
- **Erasure:** Request deletion (subject to legal retention requirements)
- **Portability:** Request transfer of data to another controller
- **Objection:** Object to processing based on legitimate interest

8. Contact

Data Protection Officer: dpo@nihaocarbon.com

You have the right to lodge a complaint with the relevant supervisory authority.