

## Privacy policy

### 1. INTRODUCTION

Investment Way to Wealth Platform (W2W Platform) (further "Platform" or "we"). When using of Services of the Platform on the Internet you will be asked to provide personal information ("Personal information"). We undertake to observe confidentiality of your data and also to provide data protection and personal privacy. Therefore, we provide this Privacy policy to help you to understand how we collect, we use, we store and we protect your personal information with the purpose to offer you investment services further of "Service". If you do not understand this Privacy policy or as we address with or we use personal information which you provide us, then you can direct the questions to [support@w2w.fund](mailto:support@w2w.fund) and we will do everything possible to answer your questions in full in the shortest possible time. You have to read the given Privacy policy together with our license agreement of the end user.

### 2. CHANGES IN PRIVACY POLICY

We reserve the right, at own discretion, to modify, change or to otherwise update the real Privacy policy at any time and in connection with any changes in the legislation on data protection and confidentiality. You agree to be the connected such modifications, changes or updates and your further use of the website means your consent with any changes, brought in this privacy policy. In case of changes of the reasons assembled for personal information, we will report about it to you in the shortest possible time, and we will ask your consent if the similar notice belongs to the new additional purposes for processing. We recommend to you to check this Privacy policy regularly that from time to time know what provisions are acting.

### 3. COLLECTING PERSONAL INFORMATION

We collect personal information when you are registered on the website and use our services, make requests, participate in advertising campaigns, are registered for obtaining information or other services from the Platform or when you respond to the messages received from us (for example, questionnaires, chats or researches). Personal information which is collected by the Platform include:

- full name, residential address and contact information (e-mail and phone number);
- birth date and birth place, gender accessory, nationality;
- passport data, additional confirmation of the personality and confirmation of the made payments. For carrying out financial transactions it is necessary to confirm reliability of these data by providing the Platform the scan copies of the passport, the additional document of the client confirming the personality. In certain cases, the notarized translation of these documents into English can be necessary;
- data on activity and transactions on the customer account;
- type of professional activity;
- information on a location.

The platform can keep record and keep any form of communication with the client (electronic correspondence, phone calls, etc.) which it was made during business relations. Such records are the proof of cooperation of the Platform and the Client. Telephone record is kept without warning signal and any other notices. At visit of office of the Platform your visit can be recorded on surveillance cameras.

#### **4. AS YOUR PERSONAL INFORMATION ("PURPOSES") IS PROCESSED**

Personal information which you provide us will be processed with one or several of the following purposes:

- for providing services to you. According to conditions of use and privacy policy, personal data are necessary for providing all services and offers of the Platform: managements of your account, a private office, access to promo actions, implementation of a conclusion of financial transactions and other transactions on the account.
- for confirmation of financial transactions. For safety of financial transactions and their legality and also for the certificate of the person performing such operations.
- for processing of any of your requests for obtaining information. Information on the client of the Platform can be transferred only to this Client by his inquiry. Respectively it is necessary to make sure about the identity of the client.
- for rendering support services to you. Fully to provide full necessary consultation and/or services in the best way.
- to identification and check of the purposes. For prevention of use of services and services of the Platform in the illegal purposes.
- statistical analysis and researches. Granting products and services, informing on them and viewing of the current needs of the client according to his interests. Improvement of quality of products and services, including customer service, development and sale of new product lines and services. On pages of the website and e-mails of the Platform can contain the web beacons or tags helping to analyze data on obtaining correspondence by clients, on the number of visitors on pages of the website, etc.
- timely informing on updates of our software and/or services. At any changes of the provided services we need an opportunity to inform on it the client.
- observance of legal obligations. Observance of applicable laws, court orders and processes and also requirements of regulators. Investigation and settlement of disputable inquiries/trials.

#### **5. TO WHOM YOUR PERSONAL INFORMATION IS DISCLOSED ("RECIPIENTS")**

Within use of personal data of clients and described above, information is available to the following persons or can be transferred to the third party in such situations:

- to employees of the Platform for whom this information is necessary for the organization of normal working process. Employees have no right to disclose personal information of clients and sign the contract on nondisclosure of personal information of clients;
- to the third-party software developers creating communication systems, applications which Clients use subsequently. Information is provided only in minimum necessary volume;
- to service providers and consultants with whom contracts for providing administrative, information, analytical, marketing, financial, standard, insurance, research and other services in minimum necessary volume were signed;
- to suppliers of payment services for processing of client transactions;
- to auditors and contractors for implementation of audit, assistance or consultation on any of the business purposes of the Platform;
- to courts, tribunals and regulatory bodies when obtaining corresponding court orders and/or processes concerning the client and also requirements of regulators;
- to the public and law enforcement agencies where it is required by the law and other legal and normative documents;

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- to any party, with the consent of the client for which disclosure of personal information of the client is required for observance or application of terms of service of the Platform.

Only the minimum personal information on clients which is required for providing contractual obligations before the Platform is disclosed to the third parties. Third-party suppliers have no right for disclosure and use of personal information of our clients for any other purposes, except stipulated.

On our official site there can be references to third-party websites. It is important to understand that this notice of confidentiality does not extend to them and these resources do not apply our standards and procedures of confidentiality.

We guarantee that your information will not be provided in public institutions or bodies, except for the cases provided by the law.

### 6. YOUR CHOICE - DIRECT MARKETING

Out of respect for your right to personal privacy, we are glad to provide you an easy way to refuse obtaining from us offers on e-mail. If you want to refuse obtaining our post or TV marketing offers, you can cancel advertising subscription by means of special the reference on each sent letter or inform support service on such desire, having written the letter of the corresponding content to the address [support@w2w.fund](mailto:support@w2w.fund).

### 7. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

The rights of clients concerning their personal data cannot be violated under no circumstances. You have the right:

- to send requests for access to personal data and to obtain these data;
- to send requests for modification of information which the Platform about you has;
- to send a request for removal of the personal data;
- if you consider that processing of personal data for any reasons limits your rights and freedoms, then you can refuse information processing about you. It can lead to restriction of the services provided by the Platform to the Client as the majority of services demand processing of personal information;
- to send a request for suspension of data processing for installation of their reliability, legality of their use or in case of objection against their use;
- to request transfer of personal information to the third party. The platform can provide such data in the structured form, but is only applicable to the automated information, but not to printing copies;
- at any time to withdraw consent to processing of personal data.

Any of these inquiries you have the right to carry out, having sent the corresponding message on [support@w2w.fund](mailto:support@w2w.fund).

Responses to similar inquiries are carried out within several working days. In case Platforms more time for their permission can be required, you it will be notified in addition.

### 8. DEDUCTION

We protect confidentiality of your personal data regardless of by what method they were received (personally from you, by phone, by e-mail, on the Internet or on any digital carrier). Your personal information is saved until at us business relations work. In return, the Platform ensures safety of computer storages, paper files and other records. We take all necessary measures for protection of personal data which are under our authority, from the wrong and unauthorized use, loss, change or disclosure.

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If the Platform considers that information on the client is not required any more for achievement of the goals for the sake of which she was brought together, we delete all details identifying the specific client. But even after full and safe removal of data on the client throughout sometime after that of the Platform it can be necessary to keep account, for example, when actions of the client fall under laws on fight against money laundering. In similar situations the law provides saving data on the client for 5 years after the termination of cooperation with it, all records about the transactions which are carried out by the client also remain.

Personal information will be longer stored 5 years from the moment of the termination of the relations with the Platform in case that normative documents or legitimate interests demand, for example, judicial proceedings and disputes with the Platform. If the client refused market researches, data on him are stored in the list of suppression that the Platform knew that he does not want to receive messages.

Storage of personal data of clients can be caused more than 5 years by the legal, standard or technical reasons.

Your personal information will longer not be stored, than it is necessary for the purposes for which it was collected.

### 9. SAFETY

To ensure safety of personal data of clients and users of the official site, the Platform developed and introduced rules and technical measures for information security. All operations which are carried out by the client within the Platform website are safe. For the purpose of protection of the website the certificate of the server which confirms reliability of the Platform is used, the system of enciphering of the transferred data – Secure Sockets Layer (SSL) is also applied.

At logging into the personal account on an official web resource of the Platform the login and the password which are personal property of the client is requested. The platform is not responsible for how these data are used and as the client manages with their help by the accounts. If the client found any unauthorized or suspicious actions with the personal account, he without fail has to report about it having written the letter on [support@w2w.fund](mailto:support@w2w.fund) to technical support of the Platform.

### 10. COOKIES

Cookies files are small text fragments which the Platform sends from the website to the client's browser. They are stored in the client web browser and allow Platforms or the third party to distinguish you by the unique identification number, doing visit of the website by more comfortable. Files of cookies can be constant and sessional.

When clients use the Platform website, can be placed in their browser by several cookies files which are used in such purposes:

- for inclusion of some functions of the website;
- for granting analytics;
- for safety of preferences of the client;
- for ensuring delivery of advertising materials, including for a remarketing.

Depending on the carried-out function different types of files of cookies can be used:

- the main – for authentication of users and prevention of fraudulent actions with accounts;
- strictly necessary – they provide navigation on a web resource, use of its functions, access to the registered and protected areas;

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- productive – the files collecting data on how you used the website, this information allows to reduce generally load of internal infrastructure of the Platform. Such files allow to trace set of use of a web resource of the Platform and experiments with its new functions. Information collected by these cookie allows to improve service;
- functional – help to remember the principle of login, even in case of editing data. Such cookies adapt a web resource, providing thereby expanded functionality for the client. Third-party partners can use cookies files for delivery of advertising which would interest the client. They keep track of activity of the client equipment on other websites or services. Information collected thus can be provided to advertisers and advertising networks for bringing of advertising and assessment of efficiency of advertising campaign.

Session cookies will remain on the user's computer until completion of viewing of a web resource of the Platform. Constant cookies are stored on the computer or the mobile device until removal or the expiration of their action.

Our Platform except own cookie can place also files of third-party partners for the purpose of the message of statistics of visit of the website, for providing advertising on a resource and through it, etc.

If the client removes cookies files, then in some cases he will not be able to use some functions of the official site, private office of the Platform, and some pages at the same time can incorrectly be displayed.

### 11. PROTECTION OF MINORS

The services provided by the Platform are not intended and not directed to minors. Any person registered on this website is obliged to confirm the majority having provided copies of the documents requested by the Platform. We reserve the right to request additional information for verification of Personal data. If we know that this person is a minor (according to the provided documents), we will be forced to take the corresponding steps to remove any data on such Person from our database and to limit to him access to services of the Platform.

### 12. INFORMATION ON US

This website is property and is under control of the Investment Way to Wealth Platform. If you have questions concerning this Privacy policy, write to the address [support@w2w.fund](mailto:support@w2w.fund).