

PRIVACY AND COOKIES POLICY

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1. Introduction

1.1. Freedom Finance Europe LTD (hereinafter called the "Company") is a Cypriot Investment Firm ("CIF") registered with the Registrar of Companies under number HE 324220 and regulated by the Cyprus Securities & Exchange Commission ("CySEC") under license number 275/15 and is under obligation to cooperate with MOKAS.

1.2. Following the requirements and/or obligations implemented by the following laws and regulations and in compliance with the current legal framework:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data,
- Directive 95/46/EC (General Data Protection Regulation).

the Company has established and implemented adequate Privacy and Cookies Policy that is adopted by the Board of Directors and is communicated to everyone involved to ensure their commitment to it providing basic information on the processing of personal data, its protection, and methods of processing.

2. Definitions

2.1. **Personal Data** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2. **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.3. **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

- 2.4. **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- 2.5. **Cookie** refers to a small piece of text that websites send to the browser, and which is stored on the User's terminal, which may be a personal computer, a mobile phone, a tablet, etc. These files allow the website to track, personalize, and save information about each User's session, such as language and preferred options, which can make his/her next visit easier and make the site more useful for him/her.

3. **Scope and purpose**

- 3.1. The purpose of the present Policy is to inform the client about the ways the Company handles and protects client's personal data complying with the applicable legislation of Cyprus and the EU and to illustrate, in connection with the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR"), what information we collect and why, as well as how we utilize it and what options on the website our clients can access.

4. **General principles**

- 4.1. The Company Freedom Finance Europe LTD is committed to your data protection and data privacy. We recommend you read the present Privacy and Cookies Policy to better understand what information we collect, how we use it, and who we may share it with. Additionally, this Privacy Policy will provide you with details on how you can control the use and disclosure of your information.
- 4.2. The Company Freedom Finance Europe LTD is considered a "data controller" as it relates to any Personal Data or Personal Information (as those terms are defined by applicable law) shared in connection with your use of our website, including your customer information, as applicable. By visiting, joining, or using Freedom Finance Europe LTD websites or application, or otherwise indicating that you agree to this Policy which is an Appendix to the General Terms of Business available on the Company's website, you agree to, and authorize our use of your Personal Information as described in this Privacy and Cookies Policy.
- 4.3. If you have any questions regarding the provisions of this Policy, please contact our Data

Protection Officer by phone: +357 25257787 or by email: dpo@ffineu.eu

- 4.4. This Policy covers information collected by our Company through its websites and application and describes the Personal Data that we process and collect from website visitors and users or potential clients completing the onboarding process to become a client of the Company, Service Providers and third parties who perform functions for us, personnel who are our employees or authorized contractors, and job applicants.
- 4.5. For the purposes of this Policy, Personal Data means any information relating to an identified or identifiable natural person.
- 4.6. When collecting the personal data, the Company following the General Regulation for the Protection of Personal Data (EU) 2016/679, takes into consideration all the necessary organizational measures and principles governing the processing of personal data:
- it shall be subjected to legitimate and lawful processing in a transparent manner,
 - it shall be collected for specified, express and legitimate purposes and shall not be subjected to further processing in any way incompatible with the purposes for which this data is collected by the Company,
 - only the appropriate and relevant data shall be collected, limited to the necessary purpose for which it has been collected,
 - it shall be accurate and updated as necessary,
 - it shall be retained only for as long as required by the Law and for the purposes for which it has been collected,
 - it shall be subjected to processing in a manner guaranteeing required security against non-authorised or unlawful processing and accidental loss, destruction or wear, among other things, through the use of suitable techniques and or organizational measures,
 - when we transmit your personal data whether to another country or to a person who carries out the processing on behalf of the Company, the necessary measures shall be taken by us for the protection of your personal data, as for example through the conclusion of specialized contracts for data processing.

5. Data processing and autosaving

- 5.1. When Users browse the website, read its pages, and download the information contained in it, the website acquires some navigation data, the transmission of which is implicit in internet communication protocols.

- 5.2. This may include user IP addresses, type of browser used, access website addresses, pages visited within the site, access time, the code indicating the response status given by the server and other parameters relating to the operating system and the User's IT environment.
- 5.3. When clients or potential clients visit our website, the way you are doing right now, the web server collects and saves the following data:
- The address (URL) of the web page you visit;
 - The used operating system;
 - The browser and its version;
 - Date and time;
 - The address (URL) of the page you visited before (referrer URL);
 - The hostname and the IP address of the device via which the website was accessed;
 - Web server log files.
- 5.4. This data is needed to use web services and is not collected to be associated with identified data subjects but is used to make the site more useful for its visitors, to obtain aggregated and anonymous statistical information on the use of the site and to check its proper operation. No information on Users/visitors will be sold, shared or used for commercial purposes.
- 5.5. Web server log files tend to be stored for half-month and are deleted automatically when this period ends. We do not disclose this information to anyone, but the risk of this information being accessed by third parties illegally still exists.
- 5.6. Under Article 6, Paragraph 1 of GDPR (Lawfulness of processing), legitimate interest should take place in maintaining this website's faultless operation by gathering web server log files.

6. Storage of personal data

- 6.1. Personal data that the visitors provide to our website, including name, postal address, email address, or other personal details when completing a form or leaving comments, along with the IP address and time, will only be utilized by us for the purpose mentioned here, will be stored securely and will not be obtained by third parties.
- 6.2. Consequently, we are making use of personal data for communication purposes only from users who are willing to contact and to offer the product and services provided on the

website. We will not disclose personal details without your allowance, but it is not possible to exclude the risk of this information being accessed by someone else illegally.

- 6.3. In the case of sharing personal data via email, which implies that you do it outside our website, we cannot guarantee that it will be safe and secure. Our recommendation is to avoid sending confidential information by email with no encryption.
- 6.4. Due to Article 6, Paragraph 1 of GDPR (Lawfulness of processing), the legal framework means that your consent to process the provided data is required.
- 6.5. It is possible to revoke the consent at any time you like by sending an informal email. The relevant contact details are provided in the present Policy.

7. Rights according to the General Data Protection Regulation

7.1. Under the provisions of GDPR, our visitors have the following rights:

- Right to information (Article 16 GDPR);
- Right to erasure (“right to be forgotten”) (Article 17 GDPR);
- Right to restrict data processing (Article 18 GDPR);
- Right to be notified – obligation regarding rectification or erasure of personal data or restriction of processing (Article 19 GDPR);
- Right to data portability (Article 20 GDPR);
- Right to object (Article 21 GDPR);
- Right not to be subject to a decision based solely on automated processing, including profiling (Article 22 GDPR).

7.2. Our visitors can always contact the Commissioner for Personal Data Protection of the Republic of Cyprus if they suppose that the processing of their personal information causes breaches of data privacy laws or that their data privacy rights have been infringed.

8. Name and address of the legal entity liable for data processing

8.1. The legal entity liable for data protection and data processing under the Data Protection Regulation, other laws protecting data used in the member states of the European Union, and other regulations connected with data protection is:

FREEDOM FINANCE EUROPE LTD

Christaki Kranou 20, Freedom Tower, 5th Floor 4041 Germasogeia, Limassol, Cyprus

Email: info@freedomfinance.eu

Website: <https://freedomfinance.eu>

Data Protection Officer: Oleg Tupiko

Email: dpo@ffineu.eu

9. TLS encryption with HTTPS

9.1. The Company utilizes HTTPS to spread the data over the internet in an interception-proof way, which means that the information is protected via technology by design Article 25, Paragraph 1, GDPR. With the help of TLS (Transport Layer Security), an encryption protocol applied to spread data over the internet securely, we can guarantee that your data is protected and remains confidential. You can see that this data transmission security system is applied with a little lock symbol located in the browser's upper left corner as well as the "HTTPS" scheme used as a part of the website's address

10. Cookies

10.1. General information

10.1.1. To store user-specific data, our website utilizes HTTP cookies. A cookie happens to be a small package of information that the web browser and the web server exchange, but it has no meaning to them and is only utilized for the web application (e.g., online shopping – for the goods in a virtual shopping cart).

10.1.2. Cookies can be either first-party cookies built by our website or third-party cookies developed by other websites (e.g., Google Analytics).

10.1.3. Examples of cookie data:

- Expiration period: 12 months;
- Name: `_ga`;
- Example value: `GA1.2.1326744211.152311093252`;
- Usage: differentiation of website visitors.

10.1.4. The three categories of cookies are:

1. Functional cookies to guarantee the website's performance;
2. Essential cookies to keep the basic functions operating;

3. Targeted cookies to enhance the user experience.

10.1.5. Thanks to the use of cookies, our website is easy to navigate. Some of them are kept on your device until you delete them. They make it possible for us to recognize the browser when you start navigating the website next time.

10.1.6. All the Cookies are divided into two domains:

- a) Root domain - freedom24.com;
- b) Localized.

10.1.7. The following tags bound to the root domain freedom24.com:

_dc_gtm_UA-41519441-4, _ga, _gcl_a, _gid, web_app_ga, web_app_ga_M19QP7JY69 – tags from GA - are needed for tracking activity and transferring data to GA by id - UA-41519441-4 (do not transfer personal data);

_fbp – tags from FB pixel - needed for tracking activity and transferring data to FB (do not transfer personal data);

fz(fvdt|gtd|ssn|uniq)* – tags from Finteza Analytics - needed for tracking activity and transferring data to Finteza;

dashly_(auth_token|device_guid|realtime_services_transport|session|session_started|uid)* – tags from Dashly - needed for tracking activity and transferring data to Dashly) – MANDATORY;

cjConsent – tag from CJ Affiliate - needed to track activity and transfer data to CJ Affiliate (does not transfer personal data);

csrf_cookie – service tag for CSRF protection against code injection - installed by us (does not transfer personal data) – MANDATORY;

http_referer - service tag for transferring data about the user's referrer when going to the website – used as part of determining the source of the attracted client (does not transfer personal data) – MANDATORY;

language – service tag for transferring data about the selected localized version of the site

- used to improve the quality of services provided to the user (does not transfer personal data) – MANDATORY;

lp_session_id - service tag for transmitting session data - used to improve the quality of services provided to the user (does not transfer personal data) – MANDATORY;

tempId – marketing one-time tag - is transmitted in the event of a conversion to some affiliate networks connected to the process of attracting users to the site (does not transfer personal data).

10.1.8. The below tags are linked to a localized domain:

__ar_v4 – marketing tag - required for proper work of Google DoubleClick;

dashly_testcookie - tag from Dashly - needed to track activity and transfer data to Dashly) – MANDATORY.

10.2. Set, delete or disable cookies

10.2.1. If you are willing to delete the cookies, to change the cookies settings or to figure out which cookies are stored, You have to open your browser settings:

- Chrome: Activate, delete, and manage cookies in Chrome;
- Safari: Manage cookies and website data with Safari;
- Internet Explorer: Delete and manage cookies;
- Firefox: Delete cookies to remove data that websites have stored on your device.

10.2.2. It is possible to set the browser to notify you when cookies are stored and ask you to approve it every time if you do want to store your data through cookies. Moreover, you are free to disable or delete cookies that are already stored on your device at any time. The process is different for every browsers. For this purpose, you can check the instructions on Google with the help of the phrase "Disable cookies Chrome" or "Delete cookies Chrome" if it is Chrome, or you can put the name of your browser instead of "Chrome," for example, Safari, Edge, or Firefox.

10.2.3. Some pages and features on our website may not work properly if there is no allowance to use cookies from your side (i.e., you get them disabled in settings).

11. Disable personalized advertising

11.1. Users can restrict personalized advertising on the page if they obtain a Google Account: <https://adssettings.google.com/authenticated>. Even if you do that, you might still see advertisements based on details, like browser type, your location received from the IP address, and the search terms you recently used.

12. Third parties Privacy Policies

12.1. Google Fonts Privacy Policy

12.1.1. Our website utilizes Google Fonts from the company Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). The usage of Google Fonts doesn't require any authentication, and cookies are not sent to Google Fonts API. No Google account data will be shared with Google while utilizing Google Fonts if you obtain a Google account. The use of CSS and the Fonts applied is the only information recorded and stored securely.

12.1.2. For more information, please, check <https://developers.google.com/fonts/faq?tid=311093252>.

12.1.3. It is possible to learn what information is collected by Google and how this data is utilized at <https://www.google.com/intl/de/policies/privacy/nachlesen>.

12.2. Google Analytics Privacy Policy

12.2.1. We utilize Google Analytics from Google LLC (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) in order to evaluate user data statistically. Google Analytics applies target-oriented cookies for doing so.

a) Cookies from Google Analytics

- `_ga`
- Expiration period: 2 years
- Usage: differentiation of website visitors
- Example value: GA1.2.1326744211.152311093252
- `_gid`
- Expiration period: 24 hours

- Usage: differentiation of website visitors
- Example value: GA1.2.1687193234.152311093252
- `_gat_gtag_UA_<property-id>`
- Expiration period: 1 minute
- Usage: is applied to throttle the request rate. When Google Analytics is submitted via the Google Tag Manager, this cookie is named `_dc_gtm_<property-id>`.
- Example value: 1

If you want to learn more about terms of use and data protection, you should visit <https://support.google.com/analytics/answer/6004245?hl=en>.

b) Pseudonymization

Our concern about the GDPR is the enhancement of both web presence and offer. As our visitors' privacy is a high priority for us their data is pseudonymized. The processing of the data is based on the legal provisions of Article 6 of GDPR, Paragraph 1.

c) Deactivation of data collection by Google Analytics

The users of the website can disable Google Analytics from accessing their data when utilizing the browser add-on to stop Google Analytics-JavaScript (ga.js, analytics.js, dc.js).

It is also possible to prevent the gathering of information generated by the cookies connected with your use of our website and forwarded to Google. In addition to that, you can prevent the processing of this information by Google if you download and install the browser plugin accessible at the below link:

<https://tools.google.com/dlpage/gaoptout?hl=en>

12.3. Google Analytics IP anonymization

12.3.1. On our website we have applied the IP address anonymization of Google Analytics. Google developed this function to guarantee that this website meets the applicable data protection regulations and local data protection authorities' recommendations in case they ban the storage of full IP addresses. We have also implemented IP address anonymization. It means that IP addresses are masked or anonymized when they get into the Google Analytics data collection network and before the information is processed and/or saved.

12.3.2. For more information, please, check

<https://support.google.com/analytics/answer/2763052?hl=en>.

12.4. **Google Analytics reports on demographic characteristics and interests**

12.4.1. We are using Google Analytics advertising reporting features. The interests and demographic reports comprise details about gender, age, and interests. This allows us to receive a better understanding of our visitors without having to assign this information to individuals. You are free to find out more about the advertising features at https://support.google.com/analytics/answer/3450482?hl=de_AT&utm_id=ad.

12.4.2. You may stop utilizing the information and activities of your Google Account. For this purpose, you need to click the Checkbox under "Advertising Settings" at <https://adssettings.google.com/authenticated>.

12.5. **Google Analytics Addendum for data processing**

12.5.1. There is a direct customer agreement between Google and us regarding the use of Google Analytics by complying with the "Data Processing Addendum" in Google Analytics.

12.5.2. Users can learn more about the data processing addendum for Google Analytics at https://support.google.com/analytics/answer/3450482?hl=en&utm_id=ad.

12.6. **Google AdSense Privacy Policy**

12.6.1. We utilize Google AdSense on this website, which is the advertising program from Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA).

12.6.2. Your IP address and information on the introduced advertising materials might be transferred to servers in the USA and processed there.

12.6.3. The aim of cookies in AdSense is to improve advertising, and they do not include any personal details. After every click, impression, or any other activity that results in a request to the servers of Google AdSense, it sends a cookie to the browser. If it accepts that cookie, it will be kept there.

12.6.4. It is possible for third parties to access AdSense in order to locate and read cookies in the browser or utilize Web Beacons to keep data that they have through spreading ads on the website. Web Beacons are tiny graphics that provide log file analysis and recording, and

they are applied for statistical analysis for online marketing purposes.

12.7. **Dashly Privacy Policy**

12.7.1. We apply the Dashly services to gather personal data about visitors. Thanks to it, we can identify and communicate with you, as well as provide you with information and access to Products. The Personal Data consists of visitors' phone number, name, technical user personal data, email address, along with other information submitted by them and allowing us to identify such a customer, directly or indirectly. The Personal Data is collected to record and use the submitted details in our databases; conducting statistical research, providing services and access to them, getting feedback, responding to user requests, providing information about advertising materials and services, analytics of user activity on the website and its functioning, to enhance our services and Products, and to notify about the services' progress with the help of different communication means.

12.7.2. These means of communication can be:

- Mailing lists;
- The Internet;
- Telephone;
- Email;
- SMS/MMS messages;
- Messages through communication services, like WhatsApp/Viber, etc.

12.7.3. The information gathered about visitors is hosted on the Google servers, and Google is known for its attitude when it comes to security. Furthermore, this data is decentralized.

For more information, you can click on the following link:

<https://www.dashly.io/terms-and-policies/>.

12.8. **Facebook Privacy Policy**

To learn more about the Facebook Privacy Policy, please, visit:

<https://www.facebook.com/privacy/explanation>.

12.9. **Rakuten Advertising Privacy Policy**

Rakuten Advertising is a third-party company that uses cookies on our website. You can

view their privacy policy following the below link:

<https://rakutenadvertising.com/legal-notices/services-privacy-policy/>

12.10. **AWS Privacy Policy**

We use the following services of the AWS:

- Detecting face liveness - Amazon Rekognition

<https://docs.aws.amazon.com/rekognition/latest/dg/face-liveness.html>

- CompareFaces - Amazon Rekognition

https://docs.aws.amazon.com/rekognition/latest/APIReference/API_CompareFaces.html

Amazon Web Services (AWS) is a third-party company. You can view their privacy policy following the below link:

<https://docs.aws.amazon.com/pdfs/rekognition/latest/dg/rekognition-dg.pdf#data-protection>.

12.11. **Sum and Substance Ltd Privacy Policy**

We use the following services of Sum and Substance with its Web and Mobile SDKs:

KYC/AML procedures, remote identity verification through Document Check, Face Match/Liveness Check, Databases Check for individuals .

We and Sum and Substance entered into a Personal Data Processing Agreement sets out the additional mandatory clauses required by Article 28(3) of the General Data Protection Regulation ((EU) 2016/679) for contracts between controllers and processors, on which Sum and Substance will process Personal Data when providing mentioned above services.

Sumsub is a third-party company. You can view its privacy policy following the below links:

<https://sumsub.com/privacy-notice-website/>

<https://sumsub.com/privacy-notice-service/>

13. **Tradernet**

13.1. **Tradernet – Language**

Thanks to this parameter, the website assigns you language cookies so that you can access the service in the required language version for one month.

13.2. Tradernet – LP Session ID

The Session is necessary to get your user session identified. The service usage is connected with registration as well, and the storage period lasts for one year.

13.3. Tradernet – CSRF

It happens to be a set for CSRF protection to get customer actions validated. The retention period is over when the browser is closed.

You may learn more about data gathered by Google and how it is utilized at:

<https://policies.google.com/privacy?hl=en-GB>.

14. Policy review

14.1. The present Policy shall be reviewed annually or whenever a material change occurs that affects the Company's procedures and principles related to privacy and cookies obligations and requirements.