

PRIVACY POLICY

1. GENERAL

This Policy is a privacy statement and aims to inform you on how we collect, use and disclose your personal data, the purpose for processing and your legal rights as data subjects pursuant to the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Protection of the Personal Data Processing Act 2018.

2. WHO ARE WE

LITKE TECHNOLOGY CO. LTD is a company that provides services of Customer relationship management (“CRM”) to Forex companies (“Services”) and is registered in Cyprus under company registration number HE 449680. Our office is located at 8 John Kennedy, IRIS BUILDING, Floor 7, Office 740B, 3106, Limassol, Cyprus.

3. HOW WE COLLECT YOUR PESONAL DATA

We collect and process different types of personal data which we obtain from you through electronic forms.

We may also collect personal data from other publicly available sources (e.g. the Internet) which we lawfully obtain and are allowed to use.

4. WHAT PERSONAL DATA WE COLLECT

We collect the following personal Information:

- Once you entered our website, we may collect information about the hardware from which you access the website, such as your IP address, geographical location, browser/platform type and version, Internet Service Provider, operating system, referral source/exit pages, length of visit, page views, website navigation.
- Contact information, such as name, address, and e-mail address;
- Company information, such as jurisdiction, registration number, KYC documents and etc;
- Account information, such as username and password;
- Financial information, such as bank account numbers, bank statement, trading activity and history, commissions charged, etc;
- Identity verification information, such as images of your passport, national ID card, driving license or other documents requested by our compliance department;
- Residence verification information, such as Utility bill details or similar information;

- Other information, obtained during our KYC procedures, such as information about your financial state and source of funds.
- Customer Information: through the use of the Services, you may enter and upload information relating to your customers and leads (“Customer Information”) which might include, but not limited to, name, surname, email address, mailing address, KYC information, financial information, etc.

5. WHY WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS

We are committed to protecting your privacy and handling your data in a transparent manner and as such we process your personal data in accordance with the GDPR and the data protection statute law for one or more of the following reasons:

A. Contract necessity

We collect and process this information to contact you, for billing purposes, to identify you when you use our Services and to enable you to use our Services

B. Legal obligation

There are some legal obligations arising from relevant laws and statutory requirements e.g. the Protection of Wages Act of 2007.

C. Legitimate interest

We process personal data to safeguard legitimate interests pursued by ourselves or by a third party. Legitimate interest occurs when we have a business or commercial justifiable reason to process your personal data, as long as this is necessary and is not unfair to you.

6. DISCLOSING AND TRANSFERRING PERSONAL DATA

A. Disclosures to third parties

In providing the Services, we may share some of your Personal Information with our third party service providers who help with our business operations. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide Services or as required by law. By using our website or Services you consent to the disclosure of your Personal Information as described in this Privacy policy. Our third party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms no less protective those described in this Privacy policy, or those we are subject to under applicable data protection laws.

B. Disclosures to legal authorities

We may share your Personal Information with law enforcement, data protection authorities, government officials, and other authorities when:

- Compelled by a court order, or other legal procedure;
- We believe that the disclosure is necessary to prevent physical harm or financial loss;
- Disclosure is necessary to report suspected illegal activity;
- Detect, investigate and prevent fraudulent transactions or unauthorized or illegal activities;
- Disclosure is necessary to investigate violations of this Privacy policy or any our agreement with you.

7. HOW LONG WE KEEP YOUR PERSONAL DATA FOR

We shall keep your personal data for as long as we maintain a contractual relationship. Upon termination of this relationship, we erase all relevant information within 12 months, unless there is a justifiable reason not to do so.

8. YOUR DATA PROTECTION RIGHTS

- **Right to be informed.** You have the right to be informed about the collection and use of your personal data.
- **Right of access.** You may ask for a free copy of your personal data that is being used.
- **Right of rectification.** You may ask to erase or rectify inaccurate or incomplete personal data.
- **Right to erasure (right to be forgotten).** You may ask us to erase your personal data, as long as there is no justifiable reason for us to continue to do so.
- **Right to restrict processing.** You can ask us to restrict the purposes of your personal data processing.
- **Right to object to processing.** You have the right to object to processing when we rely on a legitimate interest. In such a case we shall stop processing your personal data unless we prove that compelling legitimate grounds override your rights and freedoms.
- **Right to data portability.** You can also ask us to transfer your personal data directly to another business.
- **Right to withdraw consent.** You may withdraw the consent you have given us at any time.
- **Right to report a complaint.** If you have concerns about the way we use your personal data, you may contact us. You also have the right to report us to the Commissioner of Personal Data Protection through the website <http://www.dataprotection.gov.cy>.

9. HOW TO COMMUNICATE WITH US

If you wish to exercise any of the above rights, ask any question and/or request any clarifications concerning the way we use your personal data, you may contact us via our website <https://litkesc.com/> or by post: 8 John Kennedy, IRIS BUILDING, Floor 7, Office 740B, 3106, Limassol, Cyprus.

10. CHANGES TO THE PRIVACY NOTICE.

We reserve the right to amend the present private notice from time to time, informing you accordingly each time. In such case the number and issuance date of the private notice displayed will be reviewed.

Do not hesitate to contact us through our Data Protection Officer for anything you need regarding the present notice.