

## PRIVACY and Cookies Policy

We respect your privacy and are committed to protecting it through our compliance with applicable privacy and data protection laws and regulations. Please read this privacy policy carefully to understand our policies and practices regarding your personal information and how we will process and manage it.

By using our Website, you are accepting the practices described in this privacy policy.

This is the privacy statement of Performance Ronnaru Company Limited (hereinafter, we, "our", "us", "PRC", "the Company"), PRC is a company regulated by the Cyprus Securities and Exchange Commission 253/14 with its address at 7B Andrea Papakosta Str.1037 Nicosia, Cyprus

Similar, any reference to "you", "your" or "yourself" in this privacy notice is a reference to any customer or potential customer.

PRC is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you or that you provide to us, directly or indirectly, will be processed by us. Please read the following carefully to understand our views and practices regarding personal data and how we treat it.

We are committed to protecting and respecting your privacy. This Privacy Policy ("Policy") describes how we treat information that you provide to us or that we collect about you.

Any personal data that is collected by the Company through the provision of the Services shall be processed according to the Processing of Personal Data (Protection of Individuals) Law 2001 (the "Personal Data Law"), as amended or replaced from time to time, and according to the General Data Protection Regulation (EU) 2016/679 (the "GDPR").

### Collection of Personal Information

We collect and use several types of information from and about users of our Website, including information by which you may be personally identified and that is defined as personal data or personally identifiable information under applicable law (referred to as "Personal Information"), such as the following:

- your first and last name,
- address
- date of birth and gender
- ID and/or passport number
- e-mail address,
- billing information,
- Profession and employment details
- Country of registration, nationality and residence
- IP addresses,
- demographics,
- landline or mobile number, or
- other (online) contact information.
- information about your income and wealth including details about your assets, liabilities, savings and financial statements,
- details about your trading account balances, trading statements and trading performance
- national/tax identification number



If you are opening an account with us, we are required by law to identify You. Anti-Money Laundering laws require us to sight and record certain documents (identification documents or other relevant documents to the services we provide to You).

We are required to collect additional information such:

- ✓ Corporate documents
- ✓ Shareholders,
- ✓ Directors
- ✓ Officers, including

personal information on the Shareholders and Directors and including any additional information we deem necessary to be compliant with legal and regulatory requirements. The Company uses your personal information for the purpose of satisfying regulatory and legal requirements.

### Disclosure of Your Personal Information

We want you to understand when and to whom we disclose Personal Information and other information we have collected about you or your activities on the Website. We do not share your Personal Information with third parties except as indicated below:

#### **Service providers.**

This includes for example our insurers, agents, specialist advisers, suppliers and subcontractors who provide us with insurance, administrative, IT, financial, verification, regulatory, compliance research or other services.

We may disclose your Personal Information to our authorized service providers that perform certain services on our behalf, including for purposes of provision of services, customer management, customization of content, advertising, analytics, verifications, functionality and security.

These services may also include fulfilling of orders, risk and fraud detection and mitigation, providing customer service and marketing assistance, performing business and sales analysis, supporting our Website functionality, and supporting contests, sweepstakes, surveys and other features offered through our Website.

These service providers may have access to Personal Information needed to perform their functions but are not permitted to share or use such information for any other purposes.

Please be aware that where your Personal Information has been shared with third parties, they may keep a record of any searches and may use the search details to assist other companies in performing their searches

We act as a controller, as defined under GDPR. Performance Ronnaru Company Ltd is the personal data controller for the data gathered from you.

The Company has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Policy and any privacy notice provided to you throughout the Services provided by the Company.

We are committed to protect and safeguard your personal information and will maintain appropriate measures to ensure that any data provided to us is protected by a level of security access, unlawful destruction, loss, alteration or unauthorized disclosure.

We train our employees to respect the confidentiality of information. Our employees are required to respect the confidentiality via internal agreements that the company has in place for GDPR.

## Cookies (or browser cookies)

Cookies are small text files that are stored in your web browser or downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie, and allow a website to recognize a user's device.

We currently use the following types of cookies:

- **Cookies that are strictly necessary:** These are cookies that are required for the operation of our Website. These include, for example, cookies that enable a user to log into the members' area of our Website and to check if a user is allowed access to a particular service or content.
- **Analytical cookies:** These cookies allow us to recognize and count the number of users and to see how users use and explore our Website. These cookies help us to improve our Website, for example by ensuring that all users are able to find what they are looking for easily.
- **Functionality cookies:** We are always glad to see you back. This type of cookies allows us to recognize you when you return to our Website in order to greet you by name and to remember, for example, your choice of language.
- **Targeting cookies:** These cookies record the visit of a user on our Website, the pages a user has visited and the links a user has followed in order to enable us to make our Website more relevant to the users' interests. In addition, these cookies are used to identify the websites and the marketing materials you are accessing our Website from in order to target content (for example, to automatically show you our Website according to your language settings).

We do require that you accept cookies and you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings. However, if you decline to accept cookies, some functionality on our Website may be disabled and you may be unable to access certain parts of our Website. Cookies can be either session cookies or persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires or you delete your cookies. Expiration dates are set in the cookies themselves; some may expire after a few minutes while others may expire after multiple years.

### **Analytics:**

We may use your Personal Information to determine whether users of the Website are unique, or whether the same user is using the Website on multiple occasions, and to monitor aggregate metrics such as total number of visitors, pages viewed, demographic patterns. It is in our legitimate interest to use your personal information in such way to provide you with our services.

### **Compliance:**

We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

## Your consent

Where our use of personal information does not fall under one of the Lawful bases, we require your consent. Such consent should be freely given by You and You have the right to withdraw your consent at any time by contacting us using the contact details as set out in this privacy policy.

## Your rights

- a. You may ask us to provide you with copies of the personal information that we hold about you, or with information about the processing of such information.
- b. Request correction of the personal data that we hold about you. You may ask us to update and correct any out-of-date or incorrect personal information that we hold about you.
- c. Request erasure of your personal data. You may ask us to delete the personal information we hold about you.
- d. Withdraw consent at any time where we are relying on consent to process your personal data.

However, if you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, then please contact us at [support@prcbroker.com](mailto:support@prcbroker.com)

## Changes to this Policy

We may change this Policy from time to time for various reasons such as changes to reflect in law and regulation, changes in industry practices and technological developments. You will be notified of any changes of this Policy via e-mail. Any new version of this Policy shall take effect (i) immediately upon the date of your receipt of the notification e-mail where the changes to this Policy relate to non-material changes which do not reduce your rights; or (ii) no less than thirty (30) days after your receipt of the notification e-mail regarding the changes to this Policy.

If you have any questions about this Policy, including any requests to exercise your legal rights, please contact us using the below:

## Contact Details

For any questions or clarifications, please contact our Data Protection Officer. You also have the right to withdraw your consent to use your personal data in the future, in whole or in parts, or request deletion of your personal data. Form for erasure of data available on request.

E-Mail: [dpo@prcbroker.com](mailto:dpo@prcbroker.com)

Telephone: +357-22-250328

Performance Ronnaru Company Ltd

A Cyprus Investment Firm Licensed and Regulated by the Cyprus Securities and Exchange Commission (Cysec)

License number: 253/14

Incorporated in the Republic of Cyprus Reg No: 317107

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