



# GWG (CYPRUS) LIMITED

## PRIVACY POLICY

PRIVACY POLICY	
APPROVER(S):	Board of Directors
OWNER:	GWG (Cyprus) Ltd
CONTACT PERSON:	Compliance Officer
CREATION DATE:	April 2022
VERSION:	1.1



# GWG (CYPRUS) LIMITED



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# GWG (CYPRUS) LIMITED

## 1. Introduction

### 1.1 Company Information and Legislation

GWG (Cyprus) Ltd (hereafter the “**Company**”) is a Cyprus Investment Firm, authorised and regulated by the Cyprus Securities and Exchange Commission (the “**CySEC**”), with a licence number 291/16.

This policy is created to reflect Law 125(I)/2018, as adopted for the effective implementation of the Regulation (EE) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereafter the “**GDPR**”).

### 1.2 Purpose of this Policy

For the provision of services from our Company, we require to collect personal information during the registration and throughout the time that you use our services. This Policy intends to explain how any information you provide us will be used and utilised. Any personal information that we hold, will be governed by the most up to date Privacy Policy.

This Policy statement aims to give you information on how the Company collects and processes personal data through your use of this website and the platform, including data provided through this website when purchasing products or services as per the Client Agreement.

### 1.3 Controller

The Company is the controller and responsible for your personal data.

For any questions that you may have regarding this Policy or to exercise your legal rights, please contact:

#### **Contact Details:**

Full name of legal entity: GWG (Cyprus) Ltd

Point of Contact: Data Protection Officer

Email: [dpo@gwtrade.eu](mailto:dpo@gwtrade.eu)

Postal address: 18 Kyriakou Matsi Avenue, Victory Tower, office 302, Nicosia, 1082, Cyprus

Telephone number: (+357) 22 008 100



# GWG (CYPRUS) LIMITED

## 2. Personal Data and Personal Information

### 2.1. What we collect.

Personal data and/or personal information, means any information about an individual from which a person can be identified.

More sensitive data (e.g. information about criminal convictions) warrant a higher level of protection.

The data that we may collect, use, store and transfer include but not limited to:

- Title (Mr, Mrs, Miss etc)
- Name (First name, Maiden name, Surname and Username)
- Email address
- Telephone Number
- Data of Birth
- Place of Birth
- Gender
- Home address (including documents for proof of address)
- Bank details
- Tax Identification Number (TIN)
- Photo ID or Passport Documents (for the purposes of ID Verification)
- Economic profile (including information about income, source of wealth, details about assets, trading history, savings, and others)
- Professional Data (including level of education, profession, work experience in Forex/CFD's, information about Client Experience, knowledge in forex industry and risks)
- Transaction Data (including information about deposit and withdrawal methods, products and services purchased from the Company)
- Technical Data (such as the Client's IP address, browser type, operating system, devices used to access the website)
- Information about how Clients use the website, services, and products.

We may also collect information from third parties for the purposes of confirming information provided to us for the purposes of conducting Sanction Screenings and PEP searches.

More sensitive types of personal information may also be collected and stored such as:

- Information about criminal convictions

This information is collected as part of our anti-money laundering obligations and are retained as per the regulatory requirements

### 2.2. Failing to provide personal data

All personal information and data we collect, are part of our statutory obligations or part of the contractual agreement we have with our clients. Failure to provide the requested personal



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information when requested, we may not be able to perform the contract we are entering with the client and as such we reserve the right to refuse or cancel the provision of services. Client's will be notified of such decisions if this is the case and will be done so at the time.

## 2.3. Reason we collect the above data and information.

The reasoning for the above is but not limited to:

- Identify clients and carry out the appropriate due diligence before the onboarding procedure is complete.
- Screen and use third-party sources to check the validity of the information provided (including but not limited to conducting background checks and demographic information)
- Build an Economic Profile during the registration process.
- Understand the risk appetite of the client.
- Determine, based on a client's background, their suitability and appropriateness.
- Communicate with the client.
- Safeguard client's assets
- Provide services to the client.
- Fulfil our statutory obligations (including compliance and regulatory reporting)
- To improve the services provided to clients.
- Marketing purposes
- Legal notifications

## 3. How data and Information is collected.

### 3.1. Methods of collection

Any information that is collected, can be done so through numerous ways including:

- Registration (when applying to create an account, by filling the registration forms on our website, or through any other applicable correspondence)
- Subscribe to our Marketing Communications.
- Provide us with feedback.
- Make requests under the Agreement.
- Apply for products and services.
- Automated technologies or interactions (through our website and/or app, where we automatically collect technical data about your equipment and browsing. To collect such data, we use cookies and other similar technologies. Please see our cookie policy [here](#)).

We may also use third parties or collect information through other publicly available venues such as social media, Google, partners, and others.



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## 4. Disclosure and Use of Personal Data and Information

### 4.1. Disclosure

We may have to share any personal data and information with third parties such as: Service Providers, Partners, IT and System administrative services, Lawyers, auditors, issuers based in Cyprus and the European Union and when requested by the Supervisory authority.

We require all third parties to respect the security of all the Client personal data and information and to treat it in accordance with the Law. Third-party service providers are not permitted to use Client personal data for their own purposes and are only permitted to process them for specific purposes and in accordance with our instructions.

### 4.2. How Personal data and Information is used.

We may only use Client personal data and information as and when the law allows us to do so. Most common circumstances include:

- For the performance of our contract
- Where is necessary for ours or the clients' legitimate interests
- To comply with legal and regulatory obligations.

Please see below the table explaining the purpose and/or activity relating to the use of personal data and information.

Purpose and/or Activity	Data/Information	Basis for usage
Register new client	Identity, Contact Information, Financial Information, Professional Information, Tax	<ul style="list-style-type: none"> <li>• Comply with law</li> <li>• Performance of Contract</li> </ul>
Order process and delivery: <ul style="list-style-type: none"> <li>• Manage payments</li> <li>• Collect/recover funds owed</li> </ul>	Identity, Contact Information, Financial Information, Transaction History, Marketing and Communications	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> <li>• Contract performance</li> </ul>
Notifications: <ul style="list-style-type: none"> <li>• Change in legal documents.</li> <li>• Asking for feedback</li> </ul>	Identity, Contact Information, Marketing and Communications	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> <li>• Comply with our legal obligations</li> <li>• Contract performance</li> </ul>
Troubleshooting, testing, support and system maintenance, data analytics	Technical data, Identity, Contact, Usage	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>
Knowledge and Experience Identification	Identity, Financial Information and Professional Information	<ul style="list-style-type: none"> <li>• Legal Obligations</li> </ul>



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## 4.3. Marketing

We may provide clients from time to time with personalised marketing communications based on their choices and certain personal data.

## 4.4. Opting Out

Clients have right to request the stop of sending marketing messages at any time by contacting us through this email (support@gwtrade.eu). Please note that opting out, only applies to marketing communications as we are required to keep you updated with any important changes that may affect you or your account.

## 4.5. Cookies

For more information on how we collect and use cookies please find our Cookies Policy [here](#).

## 5. Recording of telephone conversations and of electronic communication.

The Company maintains the right to record any communications, either electronic (email, social media, electronic messages), by telephone, in person or other methods not limited to the aforementioned, in relation to the services provided to its clients and their business relationship with our Company. These communications shall constitute Company property and will be considered as evidence of our communications between us and our clients.

Any of the above communication may be provided to clients upon their request.

## 6. Your legal rights

Under certain circumstances, client have rights under the GDPR in relation to their personal data:

- May **request access** to their personal information.
- May **request of correction** in cases where the information provided or the information, we have is incorrect.
- **Request erasure** of personal data. This gives the clients the right to request of complete deletion of their personal information and data, regardless of the reason. Clients may ask for deletion of their personal data and information in cases where they believe we have unlawfully processed any of their information, or in cases where we are required to delete client data and information to comply with the law. **Note** that we may not comply with your request in circumstances where we are required by law not to.
- Clients may **object to the processing** of their data and information especially in cases where there is a situation where clients feel that it impacts their fundamental rights and freedoms.
- **Right to withdraw consent** on how the data is processed.

There will be no fee to have access to your personal information, however, we may charge a fee in cases where clients are repetitive or excessive with their requests.

Any request for the above, will be attended to within one month, and if the request is particularly complex or large is size may take longer. In any case, you will be notified and kept up to date.





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## 7. Retention and Storage

### 7.1. Retention

Personal Information and Data will be retained as long as it is necessary, for any purpose that it was collected including complying with the local and international legislation, accounting, and reporting requirements.

The duration of retention depends on the kind of information, the nature of information, its sensitivity, and the potential risk of harm. Data and information may be held further than the end of the business relationship as per our regulatory requirements for duration.

### 7.2. Storage

Keeping client and other information secure is of great importance to our Company and any such information held, however they may have been collected, shall remain in the Company's records throughout the period in which a client has a business relationship with us.

Records of all information may be kept in secure computer storage, paper-based files, and other records, taking all appropriate measures to protect such personal information from being lost, misused, modified or disclosed.

## 8. Changes and Updates to this Policy

This Privacy Policy is reviewed from time to time, and we will notify you appropriately when we make changes. Clients are encouraged to review this document periodically to stay informed about our processes and data retention.