



PRIVACY POLICY

1. Introduction

I.F. GREENFIELDS WEALTH LTD (the “Company”) is a Cyprus Investment Firm (CIF) authorised and regulated by the Cyprus Securities and Exchange Commission (CySEC) with CIF Licence number 342/17.

This Privacy Policy applies to all personal data processed by the Company for the provision of investment and ancillary services in respect to every current, former and prospective client. When processing personal data, the Company is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Cyprus Law(I) of 2018. The Company acts as a Data Controller as per the GDPR provisions, which means that we determine solely or jointly with others, the purposes and means of the processing of personal data.

For the purposes of this Policy “Personal Data” means any information that could be used, on its own or in conjunction with other data, to identify an individual, directly or indirectly. “Processing” means any operation or set of operations that is performed on personal data, such as collection, recording, storage, use, disclosure, erasure or destruction.

This Privacy Policy or Notice describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

Please note that this notice is addressed to customers and potential customers.

2. Personal Data that we may collect

When you create an account with the Company, we require you to provide your first and last name, e-mail address, details about your financial status, your residential address,



phone number, date of birth, a copy of your national identity card or passport or driving licence, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address, credit card or bank card details, Tax residence and Tax Identification Number, profession and employment details, knowledge and experience in trading, risk tolerance and risk profile and other information we may consider necessary to our functions and activities and in order to be in a position and be permitted to provide our services to you.

If the Company requests you to provide to it personal data and you fail to do so the Company may not be in a position to provide a service and/or enter into an agreement with you, in which case it will inform you accordingly.

The abovementioned data are collected by the Company when you are going to open a trading account with the Company. It is required by the AML Law (the Prevention and Suppression of Money laundering and Terrorist Financing Law of 2007 -2019 as amended from time to time) and CySEC's AML Directive that the Company collects the necessary data for verifying your identity, constructing your economic profile, monitoring your account and verifying the source of funds (when it is necessary). Additionally, we use this data to set up and administer your trading account, provide technical and customer support. If you are a corporate client, we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary in order to be compliant with our legal and regulatory requirements.

We are obliged by law to record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. It should be noted that we are obliged by Law 87(I)/2017 to keep records of all telephone conversations and electronic communications that are related to transactions concluded or intended to result in transactions when dealing on own account and the provision of client order services that relate to the reception, transmission and execution of client orders.

3. Legal grounds for personal Data processing

We may process your personal data for one or more lawful bases of processing ("Lawful Basis") depending on the specific purpose for which we are using your data.

The Lawful Bases are the following:

A. To perform our contractual obligations towards you

The processing of your personal data is necessary for the performance of the trading agreement between our parties or in order to take steps at your request prior to entering into the agreement. In order to be able to render investment services to you and administer our contractual relationship, the Company needs to collect certain information about your identity, financial background and investment objectives.

B. To be compliant with applicable legal and regulatory requirements

The processing of your personal data is necessary for compliance with the legal obligations emanating from a number of laws and regulations to which the Company is subject, such as the European Markets in Financial Instruments Directive (MiFID II), the Investment Services and Activities and Regulated Markets Law of the Republic of Cyprus, the European and Cyprus Legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, the Common Reporting Standard, the Market Abuse Regulation, the European Market Infrastructure Regulation, the Foreign Account Tax Compliance.

C. To pursue our legitimate interests

The processing of your personal data is necessary for the purposes of the legitimate interests pursued by the Company, where those interests do not infringe your interests, fundamental rights and freedoms. These legitimate interests include business or commercial interests and example of relevant processing activities include: preparing the Company's defence in litigation procedures, preventing fraud and money laundering activities, managing business and further developing and marketing of products and services. Where the Company will use your personal data to pursue legitimate interest, such a decision shall be documented via a Legitimate Interest assessment by performing the three parts test:

- Identify the legitimate interest
- Show that the processing is necessary to achieve it; and
- Balance it against the individuals' interests' rights and freedoms.

Where our use of your personal information does not fall under one of the above-mentioned Lawful Bases, we will require you to provide your consent. Such consent shall be freely given by you and you will have the right to withdraw your consent at any time



by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

4. How we use your personal data

Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

- (a)** where required by law or a court order by a competent Court.
- (b)** where requested by CySEC or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients.
- (c)** to government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- (d)** to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- (e)** where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority;
- (f)** to such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services;
- (g)** to payment service providers and banks processing your transactions;
- (h)** to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- (i)** only to the extent required and only the contact details to other service providers who create, maintain or process databases (whether electronic or not), offer



record-keeping services, email transmission services, messaging services or similar services which aim to assist the Company to collect, store, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement.

- (j) to a Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR).
- (k) only to the extent required, to other service providers for statistical purposes in order to improve the Company's marketing, in such a case, the data will be provided in an aggregate form.
- (l) where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority.
- (m) to anyone authorised by you
- (n) to an Affiliate or introducing broker of the Company or any other company in the same group of the Company.
- (o) to any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or other relevant agreements.
- (p) to successors or assignees or transferees or buyers, with ten Business Days prior Written Notice to the Client; this will happen in the event that the Company decides to sell, transfer, assign or novate to a third party any or all of its rights, benefits or obligations under the Agreement with you or the performance of the entire Agreement subject to providing 15 Business Days Prior Written Notice to the Client. This may be done without limitation in the event of merger or acquisition of the Company with a third party, reorganisation of the Company, winding up of the Company or sale or transfer of all or part of the business or the assets of the Company to a third party.
- (q) Client Information is disclosed in relation to US taxpayers to the Inland Revenue in Cyprus, which will in turn report this information to the IRS of the US according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between Cyprus and the US.

5. The safety of your personal data

The Company takes the appropriate measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss,



alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

The Company implements appropriate technical and organisational measures such as data encryption, access management procedure, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy etc. Additionally, the Company limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's personal data on the Company's instructions, and they are subject to a duty of confidentiality.

Your personal data may be stored electronically or in paper form.

6. Automated decision – making and Profiling

In order to perform the contact between us and as required by Law 87(I)/2017 and the relevant Circulars issued by CYSEC, it is requested for the provision of the investment services to you, to assess your knowledge and experience, your financial situation and investment objectives.

We will fulfil the above requirements through the following tools:

Onboarding Questionnaire (including Product Governance Questionnaire) and Fitness Test: these take place when you require registering as client of the Company. Hence, we need to check and ensure that you fall within the Company's positive target market and you are suitable for the provision of the Company's services and products in regards to your categorisation, knowledge, financial background and experience in regards to financial services. Based on the results, you will be informed whether you are eligible to receive our services and become our Client. The reason for assessing you is to enable the Company to offer to you services suitable to you and act in your best interests.

The results above are monitored by the Compliance department of the Company. During these processes, the Company takes all the technical and operational measures to correct inaccuracies and minimise the risk of errors, to prevent any discrimination and to secure personal data of the client.

7. How we treat your personal data for marketing activities and whether profiling is used for such activities



We may process your personal data to tell you about products, services and offers that may be of interest to you or your business.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services. This information helps the Company to improve its services, customise browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time the Company's Data Protection Officer at the following e-mail address:

info@greenfieldswealth.com

8. For how long we store your personal data

We will only retain your personal data for as long as we reasonably require it for legal or business purposes subject to a maximum of 5 years. In determining data retention periods, we take into account local laws, contractual obligations and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it.

For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.



9. Transfers of personal data to third countries

Copies of your agreement with us may be transferred to, and stored at banking institutions in a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that where we carry out such transfers, this will be made subject to applicable laws and where required, subject to the appropriate safeguards. You may contact the Company in order to be informed of the appropriate or suitable safeguards (as the case may be).

When we transfer your data to other third parties outside the EEA, such transfers will comply with the General Data Protection Regulation (Regulation EU 2016/679, and hence we may in some cases rely on a Commission Adequacy decision, or appropriate safeguards (e.g. applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements) or other grounds provided by the GDPR.

You may contact the Company in order to be informed of the appropriate or suitable safeguards.

10. Your rights as a data subject

Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.

Right of rectification – you have a right to request from us to correct the personal data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation under Cypriot or EU law), the Company acting as your controller will erase your personal data from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where

these conditions apply, the Company will transfer your personal data to another organisation.

Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent - where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. 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.

In respect to the aforementioned rights, we will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data. You can send the relevant request to the following e-mail address: info@greenfieldswealth.com.

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case, we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

11. Contacting us about this Policy or making a complaint

If you have any queries about the contents of this Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:



Data Protection Officer

E-mail: info@greenfieldsw wealth.com

We try to respond to your request within one month from the receipt of your request. In case that your request takes us longer than one month, we will notify you accordingly and keep you updated. In this respect, it should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. Nonetheless and where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either:

(a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or

(b) refuse to act on the request

If you are not satisfied with our response to your complaint and/or your request was not handled within the timeframes specified, you have the right to lodge a complaint with our supervisory authority, the Cyprus Data Protection Commissioner. Alternatively, you also have the right to lodge a complaint with the data protection authority of your country of residence.

You can find information about how to contact the Cyprus Data Protection Commissioner on the following website: www.dataprotection.gov.cy

12. Changes to this Privacy Policy

We may make changes to this Policy from time to time. You will be notified about material changes that took place, however it is important that you check this Policy periodically so as to always be informed about how we are processing and protecting your personal data. Any personal information we hold will be governed by our most current Privacy Policy.

13. Cookies

The Company does not use cookies to store and collect information about your use of our Website.