LIRUNEX

PRIVACY POLICY

LIRUNEX LTD

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PRIVACY POLICY

1. INTRODUCTION

Welcome to the **LIRUNEX LIMITED's** privacy policy.

LIRUNEX LIMITED (referred to as **"the Company"**, **"we"**, **"us"** or **"our"**) respects your privacy and is committed to protect your personal data. The present privacy policy aims to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the General Data Protection Regulation and/or any other relevant Laws protect you.

IMPORTANT INFORMATION AND WHO WE ARE

2. PURPOSE

This privacy policy aims to give you information on how LIRUNEX LIMITED collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements any other privacy notices and is not intended to override them.

CONTROLLER

LIRUNEX LIMITED is the controller and responsible for your personal data.

We have appointed a data protection officer (hereinafter referred to as "the DPO") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are:
Full name of legal entity: LIRUNEX LIMITED
Title: DPO
Email address: legal@lirunex.eu
Postal address: Gorgonon 14 Street, Patsalos Plaza, 3rd Floor, Office No 305, Larnaca, Cyprus
Telephone number: +357 24 694888

If you have a concern about any aspect of our privacy practices, you can submit a complaint. This will be acted upon promptly. To make a complaint, please contact us via email at complaints@lirunex.eu.

If you are not satisfied with our response to your complaint, you have the right to make a complaint at any time to Cyprus Data Protection Commissioner. We would, however, appreciate the chance to deal with your concerns before you approach the Commissioner so please contact us in the first instance.

LEGAL FRAMEWORK

The privacy policy was established in line with the General Data Protection Regulation which has entered into force on 25 May 2018 and sets out most of your rights under such Regulation.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the establishment of business relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. Therefore, we ask for identity, passport or driving license for verification purposes.
- **Employment data** includes profession, details of current employment.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes your income and wealth, source of funds, CRS information, bank account and payment card details.
- **Transaction Data** includes details about payments to and from you, and also your Transaction History Data.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as per the relevant Law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

In the course of our business, when there is a need to collect personal data by Law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to provide our services to you or to perform the contract we have. In this case, we may stop to provide our services to you, but we will notify you accordingly, if this is the case at the time.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - apply for our products or services;
    - create an account on our website;
    - subscribe to our service or publications;
    - request marketing to be sent to you;
    - enter a competition, promotion or survey; or
    - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as Technical Data from analytics providers such as Google based outside the EU.

5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the Law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide our services to you or to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the following email: legal@lirunex.eu.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at legal@lirunex.eu if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges b) Collect and recover money owed to us	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact details (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact details (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact details (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If we will do so, we will either do so based on your consent or if it is in our legitimate interest.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered our website for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside LIRUNEX LIMITED group of companies for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following

the opt-out links on any marketing message sent to you or by contacting us at any time at the following email address: legal@lirunex.eu

COOKIES

The Company may use cookies to give the best possible experience when visiting the Company's website, to help improve the website's services, and to further optimize its functionality and improve security.

"Cookies" are small pieces of information that are transferred to your browser and stored on your computer's hard drive. The website requests the web browser create a small text file with a small amount of information, which it can access whilst you are viewing the website.

The Company may use a session cookie without which the website could not perform the website function. They are set automatically when pages load. A session cookie files are stored temporarily in your browser and only exists whilst you are reading or navigating the website. When you close the web browser these cookies are removed. Session cookies are never written on the hard drive of your computer and they do not collect any information from your computer.

The Company may use a persistent cookie to optimize the website by storing your preferences. It records information about choices you have made and allow us to provide more personal features. For example, if you set your location, username, password, text size, we use cookies to save these preferences. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. Persistent cookie remains in the hard drive on your computer until erased by the user or until they expire. The Company may use persistent cookies for example, by storing your preferences on your account page and remembering if you have visited the site before so that the messages intended for first-time users are not displayed to you.

The Company may use a performance cookie. This cookie shows how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information collected by these cookies are aggregated and therefore anonymous. It is only used to improve how the website works and to provide the Company with statistical information about the site. It includes activities like counting page visits, dwell time, technologies used to access the site, and page load speeds.

You can always refuse cookies on your computer by changing the browser settings. How you do this depends on the browser you're using. If you use more than one browser, you must delete cookies in each browser.

You can visit the following websites for information of how you can delete and control cookies that are stored on your computer: https://www.aboutcookies.org

Be aware that if cookies are disabled, some functionality may become unavailable to you, because they rely on the website to remember your choices.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original

purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the following email: legal@lirunex.eu.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties for the purpose of carrying out our services but should this be the case we check the issue.

We require all third parties to respect the security of your personal data and to treat it in accordance with the Law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
We shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that we do not have access to or control over. We will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or a person authorised by you (whether that authorisation is permitted by the terms of our legal relationship with you or not).

7. INTERNATIONAL TRANSFERS

We might need on certain occasions for the purposes of carrying out our services to transfer your personal data outside the European Economic Area (referred to as the **"EEA"**)

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at legal@lirunex.eu if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. DATA SECURITY

We respect the privacy of any user who accesses its website(s), and it is therefore committed to taking all reasonable steps to safeguard any existing or prospective clients, applicants and website visitors.
We keep any clients'/potential clients' personal data in accordance with the applicable data protection laws and regulations. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers for regulatory purposes.

In some circumstances you can ask us to delete your data: see ***Request erasure*** below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data 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 affects your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **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.

- **Withdraw consent at any time** 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.

If you wish to exercise any of the rights set out above, please *Contact us:*

c/o: DPO

Email: legal@lirunex.eu

Tel: +357 24 694888

Address: Gorgonon 14 Street, Patsalos Plaza, 3rd Floor, Office No 305, Larnaca, Cyprus

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

AMENDMENTS TO THE POLICY

The Company reserves the rights to review and amend this privacy policy from time to time and notify you of any such amendments accordingly by posting an uploaded version of this privacy policy on the Company's website.