

# Privacy Policy

## 1. Introduction

- 1.1. The proper handling of personal data is extremely important to us. We therefore take your privacy seriously when processing and protecting your personal data. We want you (hereinafter: «user») to understand how and why, we process, use, and share your personal information (hereinafter: «Personal Information», «Personal Data», «PI», «PD») when you use our website <https://loft.trade> or , software, applications and other online products and services (collectively, the «Services») or when you otherwise interact with us or receive a communication from us.
- 1.2. By visiting or or you are accepting and consenting to the practices described in this policy.
- 1.3. Any reference to ‘us’, ‘our’, ‘we’ or ‘LOFT’, ‘SAPPOSENTU’, ‘Company’ in this privacy notice is a reference to each company within the SAPPOSENTU group of companies as the context requires unless otherwise stated.
- 1.4. We may revise this Privacy Policy from time to time. The current version of the policy will govern our processing of your personal data and will always be available at [loft.trade](https://loft.trade) If we make a change to this policy that, in our sole discretion, is material, we may notify you via an email to the email address associated with your account. If required by law, we will request your permission or give you the opportunity to opt out of any new uses of your Personal Information.
- 1.5. LOFT collects and processes personal information that is necessary for legitimate business purposes, which will be disclosed to any person whose personal data is being collected, held or processed (hereinafter: «data subject») at the time of collection. We retain your Personal Data for as long as it is required to satisfy the purpose for which it was collected and used, unless a longer period is necessary for our legal obligations or to defend a legal.

## 2. **Purposes of Personal Information collection**

- 2.1. We may deliver, personalize, and improve our Services by combining and using the information we have about you (including information we receive on and off our Services) to understand how you use and interact with our Services and the people or things you're connected to and interested in.
- 2.2. We collect general anonymous analytical information on the use of the services for their optimization.

## 3. **What Personal Information we collect and store**

As part of our business we may collect, use, store and transfer different kinds of personal data about you:

- 3.1. **General information.** The information that we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including operator name and phone number and application version number. We also collect information about the interaction of your browsers and devices with our services, including OS, IP address, specifications and the date, time and referrer URL of your request.
- 3.2. **Customer-specific information.** These are the information the user needs to create an account, you must provide a username and a password.
- 3.3. **Actions you take.** We collect information about the actions you take when using the Services. This includes Products you trade with us; historical data about the trades and investments you have made; Your preference for certain types of products and services. It also includes your interactions with other users or projects.
- 3.4. **Other information.** You may choose to provide other information directly to us. For example, we may collect information when you request customer support or otherwise communicate with us. You may provide us with the information about your email to receive mailings and to confirm transactions.

- 3.5. We may receive personal data about you from various third parties and public sources as set out below. Technical Data from the following parties:
- analytics providers such as Google based outside the EU
  - advertising networks
  - search information providers

## 4. **Cookies**

- 4.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- 4.2. Cookies are typically stored on your computer's hard drive. Information collected from cookies is used by us to evaluate the effectiveness of our Site, analyze trends, and administer the Platform. The information collected from cookies allows us to determine such things as which parts of our Site are most visited and difficulties our visitors may experience in accessing our Site. With this knowledge, we can improve the quality of your experience on the Platform by resolving access difficulties and recognizing and delivering more of the most desired features and information.
- 4.3. We also use cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help us confirm your receipt of, and response to, our emails and to provide you with a more personalized experience when using our Site.
- 4.4. We use third party service provider(s), to assist us in better understanding the use of our Site. Our service provider(s) will place cookies on the hard drive of your computer and will receive information we select, that will educate us on such things as how visitors navigate around our site, what products are browsed, and general Transaction information. Our service provider(s) analyses this information and provides us with aggregate reports. The information and analysis provided by our service provider(s) will be used to assist us in better understanding our visitors' interests in our Site and how to better serve those interests.
- 4.5. The information collected by our service provider(s) may be linked to and combined with information that we collect about you while you are using the Platform. Our service provider(s) is/are contractually restricted from using

information they receive from our Site other than to assist us.

4.6. By visiting LOFT website you are agreeing that we may use cookies for the purposes set out above.

4.7. You can find out more about LOFT use of Cookies in our Cookie Policy available on [loft.trade](http://loft.trade).

## 5. **How we may use your personal information**

We use information held about you in the following ways:

- 5.1. to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- 5.2. to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
- 5.3. to provide you, or permit selected third parties to provide you, with information about products or services we feel may interest you.
- 5.4. to notify you about changes to our service
- 5.5. to ensure that content from our site is presented in the most effective manner for you and for your computer.
- 5.6. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- 5.7. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- 5.8. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- 5.9. to allow you to participate in interactive features of our service, when you choose to do so as part of our efforts to keep our site safe and secure
- 5.10. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- 5.11. to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

## 6. **Disclosure of your personal information**

You agree that we *may* share your personal information:

- third party apps providers when you use our apps, communication systems and

trading platforms which are provided to us by third parties;

- service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization, financial, regulatory, compliance, insurance, research or other services;
- introducing brokers and affiliates with whom we have a mutual relationship;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
- any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements;
- anyone authorised by you.

- 6.1. We engage service providers to perform functions and provide services to us. For example, we use a variety of third-party services to help operate our services and to help us understand the use of our services, such as Google Analytics. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions.
- 6.2. We may partner with third-party advertisers, ad networks to deliver advertising and content targeted to your interests and to better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, location or other information about your computer or device.
- 6.3. If you submit personally identifiable information to us through the LOFT Services, then we may use your personal information to operate, maintain, and provide features and functionality of our website, app and other services.
- 6.4. Other information that does not personally identify you as an individual is collected by LOFT (such as, by way of example, patterns of use) and is exclusively owned by LOFT can use this information in such manner that LOFT, in its sole discretion, deems appropriate.
- 6.5. We may share specific aggregated, non-personal information with third parties, such as the number of users who have registered with us, the volume and pattern of traffic to and within the website, etc. That information will not identify you, the individual, in any way.
- 6.6. As was mentioned above, when you send us messages, we can keep them for administering your inquiries, for improving our services. We shall not transfer information from such messages to third parties.

6.7. Our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

## 7. **How we store your personal data**

7.1. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

7.2. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

7.3. However, we may need to maintain records for a significant period of time. 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.

7.4. Personal data provided by you as a prospective client during account opening registration in case the registration was never completed or your account opening application was rejected, will be maintained for six months unless there is a regulatory reason requiring us to keep it for a longer period of time.

7.5. 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.

7.6. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

7.7. When we transfer your data to other third parties outside the EEA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements.

- 7.8. If you would like a copy of such arrangements, please contact us using the contact details below.
- 7.9. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 8. **How we protect your personal data**

- 8.1. We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational 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.
- 8.2. We provide the following safety measures regarding protection of Your PI:
  - 8.2.1. evaluation of the effectiveness of used security measures, prior to the launch of the website and its updates
  - 8.2.2. establishing rules to access to personal data processed by the website, as well as ensuring registration and recording of all actions performed with PI in the information systems of the website;
  - 8.2.3. detection of the facts of unauthorized access to PI and the adoption of appropriate response measures

## 9. **Your rights**

Please note that these rights do not apply in all circumstances.

- 9.1. request access to your personal data (commonly known as a “data subject access request”);
- 9.2. request correction of the personal data that we hold about you;
- 9.3. request erasure of your personal data. 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
- 9.4. 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 impacts on your fundamental rights and freedoms.

- 9.5. 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:
  - 9.5.1. if you want us to establish the data's accuracy
  - 9.5.2. where our use of the data is unlawful, but you do not want us to erase it; • 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
  - 9.5.3. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- 9.6. 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.
- 9.7. Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: support@loft.trade
- 9.8. We try to respond to all requests within 7 (seven) business days. Occasionally, it may take us longer than 7 (seven) business days if your request is particularly complex or you have made a number of requests.
- 9.9. 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.

## 10. Miscellaneous

- 10.1. If LOFT becomes aware of security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. LOFT may post a notice on our website if the security breach occurs.
- 10.2. When the personal data breach is likely to result in a high risk to the rights and freedoms of users, LOFT will inform you.
- 10.3. In the event that LOFT is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our Users as part of such merger, acquisition, sale, or other change of control. If we become involved in a merger, acquisition, or any form of sale of some or all of its assets, we will notify Users before

personal information is transferred and becomes subject to a different privacy policy. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how Your personal information is treated, transferred, or used.

## **11. Changes to our privacy policy**

- 11.1. We may revise this Privacy Policy from time to time without any prior notice. The most current version of the policy will govern our processing of your personal data and will always be at '<https://loft.trade/files/privacy-policy.pdf>'.

## **12. Contact us**

- 12.1. If You have any questions about this Privacy Policy, please feel free to contact us or to write to us at e-mail: '[support@loft.trade](mailto:support@loft.trade)' .

