

PRIVACY NOTICE

Last updated: August 25, 2023

This privacy notice for INFOXITE LTD, a legal entity, duly incorporated in Cyprus under the company number HE450645, having its registered office at A.G. Leventi, 5 THE LEVENTIS GALLERY TOWER, 13th floor, Flat/Office 1301, Nicosia, Cyprus, 1097 ("Company," "we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

Visit our website at infoxite.com or engage with us in other related ways.

Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at contact@infoxite.com

UPDATES TO THIS NOTICE

We reserve the right to periodically revise this privacy notice. An updated version will be indicated by a modified "Revised" date, and the updated edition will come into effect as soon as it becomes accessible. If substantial alterations are made to this privacy notice, we may choose to notify you through a noticeable announcement of such modifications or by directly sending you a notification. We advise you to regularly review this privacy notice in order to stay informed about the measures we undertake to safeguard your information.

TYPES OF PERSONAL DATA IN OUR POSSESSION

Personal data that we may collect, store and process includes:

- **Contact info** that you provide to us by filling in forms on the Website or any other information you might submit to us via the Website and/or email, telephone, and/or Live Chat, including the following: name (first name, surname), e-mail, phone number, address (registered address and/or address of actual operation), other necessary data (CV, links to the social media (LinkedIn, Facebook), cover letter);
- **Financial information** (form of payment, payment card number or bank account number, details of transactions, payment server, salary, income and assets);
- **Record of correspondence** whether via the Website, email, telephone or by any other means;
- **Details, necessary to provide KYC by us**: ID (national passport or governmental ID, foreign passport and/or driving license), date of birth, proof of address (Utility bill, bank statement, rent agreement), source of funds/source of wealth, legal form, registration number, an extract of registration and its issue date;
- **Details of your visits to the Website**, including traffic data, precise location data, activity logs (launches, taps, clicks, scrolling information) and other communication data;

- **Information we get from your devices** (IP address, portfolio website, cookies, computer model, operating system and its version, serial numbers, mobile device ID, your contact lists, crash data);
- **Responses to marketing campaigns from us.**

HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for a variety of reasons, depending on how you interact with our Services:

- We may process your information to provide you with the requested service.
- We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- To save or protect an individual

LAWFUL USAGE OF PERSONAL DATA

We exclusively handle your personal information under circumstances where we ascertain its necessity and possess a valid legal justification (referred to as a "legal basis") as stipulated by applicable law. This may include instances such as obtaining your consent, adhering to legal obligations, delivering services to you, fulfilling contractual commitments, safeguarding your rights, or advancing our legitimate business interests.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

Consent. We might engage in the processing of your information if you have granted us permission (referred to as "consent") to utilize your personal information for a particular objective. It's important to note that you retain the ability to revoke your consent at any point in time.

Performance of a Contract. We could engage in the processing of your personal information whenever we deem it essential to fulfil our contractual commitments to you. This encompasses the provision of our Services or addressing your pre-contractual requests before formalizing an agreement with you.

Legal Obligations. We might proceed with the processing of your information when we consider it imperative to adhere to our legal responsibilities. This can include cooperating with law enforcement entities or regulatory bodies, asserting or safeguarding our legal

entitlements, or revealing your information as substantiation in legal proceedings in which we are engaged.

Vital Interests. We could carry out the processing of your information if we ascertain it as crucial to safeguard your essential interests or those of a third party. This might encompass scenarios involving potential risks to the well-being of any individual.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way:

For investigations and fraud detection and prevention

For business transactions provided certain conditions are met

If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim:

For identifying injured, ill, or deceased persons and communicating with next of kin

If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse;

If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province;

If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records;

If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced;

If the collection is solely for journalistic, artistic, or literary purposes;

If the information is publicly available and is specified by the regulations.

SHARE OF PERSONAL DATA

We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

Business Transfers. We might divulge or transfer your information concerning, or amidst discussions related to, any amalgamation, sale of corporate assets, financial dealings, or procurement of our business, in part or in its entirety, by another company.

Affiliates. We might disclose your information to our affiliated entities, ensuring that these affiliates uphold the provisions outlined in this privacy notice. Affiliated entities encompass our parent company and any subsidiaries, joint venture partners, or other firms under our control or sharing common control with us.

Third Parties. Electronic money institutions, payment service providers, customer services, software providers, KYC providers, CRM system providers, marketing agencies, digital optimization systems and other trusted partners.

YOUR PRIVACY RIGHTS

In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws.

These may include the right:

(i) to request access and obtain a copy of your personal information,

(ii) to request rectification or erasure;

(iii) to restrict the processing of your personal information;

and (iv) if applicable, to data portability.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting at contact@infoxite.com

We will consider and act upon any request in accordance with applicable data protection laws.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at contact@infoxite.com

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have questions or comments about your privacy rights, you may email us at contact@infoxite.com

COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

Opting to decline cookies does not preclude you from utilizing our website, although it might limit your access to certain features and sections of the site. You retain the option to configure or modify your web browser controls to either accept or decline cookies. The specific methods for rejecting cookies through web browser controls differ depending on the browser you're using. To acquire more information, refer to your browser's help menu.

You can visit www.aboutcookies.org or www.allaboutcookies.org to find out more about cookies and how to set cookie preferences in your browser.

RETENTION OF PERSONAL DATA

We will legally store your Personal data for the relevant retention period. Thus, such information will be processed within a reasonable period, in accordance with the terms of AML/KYC procedures, regulatory requirements and any other applicable legislative grounds.

SAFETY STORAGE OF PERSONAL DATA

We aim to protect your personal information through a system of organizational and technical security measures.

We have instituted suitable and rational technical and organizational security measures with the intention of safeguarding the security of any processed personal information. Nevertheless, despite our precautions and endeavours to fortify your information, absolute security cannot be guaranteed for electronic transmissions across the Internet or data storage technologies. As a result, we are unable to ensure or pledge that unauthorized entities such as hackers, cybercriminals, or other illicit third parties will be unable to breach our security measures and illicitly collect, access, pilfer, or manipulate your information. While we are committed to safeguarding your personal information to the best of our abilities, the transmission of personal data to and from our Services carries inherent risks. Thus, it's advisable to access our Services within a secure environment.

COLLECT INFORMATION FROM MINORS

By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records.

SPECIFIC PRIVACY RIGHTS FOR CALIFORNIA RESIDENTS

If you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

Your rights with respect to your personal data:

Right to request deletion of the data — Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

whether we collect and use your personal information;

the categories of personal information that we collect;

the purposes for which the collected personal information is used; whether we sell your personal information to third parties;

the categories of personal information that we sold or disclosed for a business purpose;

the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

You may object to the processing of your personal information.

You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.

You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

You may request to opt out from future selling of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission. Please note that we do not sell your personal information.

To exercise these rights, you can contact us by email at contact@infoxite.com, or contact section at the bottom of this Site. If you have a complaint about how we handle your data, we would like to hear from you.

CONTACT US

If you have questions or comments about this notice, you may email us at contact@infoxite.com.