

# Privacy Policy

Version 1.0

## INTRODUCTION

This Privacy Policy (“**Policy**”) explains the privacy practices employed by **LFA International Ltd** (the “**Company**”) in providing the Service (as they defined in the services agreement) to its customers and other service providers (“you” or “**Client**”), and shall be read in the light of the legal agreements and policies agreement provided by Company.

This privacy police also regulates situations which occur before any contractual relationship between the Company and you is established, taking into consideration that the Company processes personal data of those natural persons communicating and cooperating on the basis of promotional, training, educative purposes (“non-client”). Non-client status may have also natural persons who have strived for becoming a client, however for various reasons they have not or the Company rejected to accept them.

As suggested above, this privacy also applies to processing personal data of all specific Company’s service providers, if provided by natural persons and/or legal persons, in which case we process personal data of its directors, shareholders and/or employees if necessary.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how the Company collects and processes your personal data through your use of its website, including any data you may provide through this its website and/or other affiliated website when you sign up or otherwise register. These websites are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice 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 notice supplements the other notices and is not intended to override them.

### CONTROLLER

LFA International Ltd is the controller and responsible for your personal data. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below. **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 your relationship with us.**

### CONTACT DETAILS

**Full name of legal entity:** LFA International Ltd

**Title of DPO:** Chief Executive Officer

**Email address:** info@propguru.eu

**Postal address:** Aiolou&Panagioti Diomidous, 9 Katholiki, 3020, Limassol, Cyprus

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.

## 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 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.

## 2. 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).

As per the conditions defined herein We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, Taxpayer Identification Number, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.
- **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. These data may include, but not limited to, your level and area of your education, your occupation, your annual income, your savings, your trading (demo) experience, your number of trades (demo), transaction volume, lots, your investment purpose and your personal investment goal etc. Aggregated Data may be derived from your personal data but is not considered personal data in 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 notice.

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.

## EDUCATIVE, PROMOTIONAL AND INQUIRY WEBSITES

We will collect the following personal information from you when you register to various websites containing educative or promotional offers and invitation opportunities from the Company and/or its outsourcing or otherwise cooperating partners:

- i. Full name;
- ii. Email address;
- iii. Contact details (i.e. telephone numbers, address, hometown, IP address);

This information will be held by the Company until you become the Company's Client, in which case you will be requested to provide additional personal information and supporting documentation.

During this period, you may be addressed with organizational and commercial messages and/or calls corresponding within the scope of original registration website. Regarding commercial messages, you are always entitled to reject such marketing communication simply by (a) opting-out button in the newsletter body, or (b) contacting us at the following email [info@propguru.eu](mailto:info@propguru.eu)

If you do not become the Company's client, the Company will proceed with erasure of your personal data as applicable.

This period might be prolonged by you granting us your consent to process personal data (if applicable on the website).

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we 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 perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. 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;
  - subscribe to receive trainings, webinars, seminars, e-books or (demo) trading tools;
  - enter a competition, promotion or survey;

- contact the Company with any request as every phone call is recorded; or
- give us some feedback.
- **Affiliates:** We may be provided with your personal data through affiliates. In this case you acknowledge that the affiliate may disclose or make available to the Company personal data for the purposes of the services provided by the Company. Both the Company and the affiliate are Controllers of your data for the purpose of providing their services. The Company and the affiliate are acting in common and not jointly in respect of your personal data.
- **Automated technologies or interactions.** As you interact with our website and also in accordance with the Cookies policy, 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:
  - Data from the following parties:
    - (a) analytics providers such as Google based outside the EU;
    - (b) advertising networks based outside and within the EU.
  - Other public sources providing information about your potential status as a politically exposed person or the emergence of a sanction list that we use to detect misuse, particularly fraud.

#### 4. 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 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.
- Where your freely given, specific, informed and unambiguous consent has been granted (if applicable).

In general, 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. We also rely on your consent should you choose to prolong period to receive marketing in situations specified herein. You have the right to withdraw consent to marketing at any time by contacting us at the following email [info@propguru.eu](mailto:info@propguru.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 [info@propguru.eu](mailto:info@propguru.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 (c) Financial	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 (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
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 (c) Profile (d) 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 (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 (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)
To use hashed, first-party user-provided data from our website lead forms for offline lead measurement. This allows to track offline conversions and to improve the accuracy	(a) Contact	Necessary for our legitimate interests (to help us measure the effectiveness of our ad campaigns)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
of our conversion measurement.		
To register you to services we provide and to get an insight of your interests in the Website in order to provide you with a more personalized experience and communication, especially in relation to the different services we provide.	(a) Identity (b) Contact (c) Technical (d) Usage Data (e) Profile Data	(a) Performance of a contract with you  (b) if Necessary to comply with a legal obligation (c) Necessary for our legitimate interests ( i) to keep our website updated and relevant, and provide the user with a more personalized experience, ii) asserting legal claims and defense in legal disputes, prevention and investigation of criminal offenses creditors or insolvency administrators requesting foreclosures)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Identity (b) Contact (c) Technical	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, either by ourselves or via our service providers.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To communicate with you and provide you with support through the chat tool on our website.	(a) Identity (b) Contact	Necessary for our legitimate interests, and essential in order to come into contact with you.
Educative, promotional and inquiry purposes (e.g. E-books, webinars, seminars, inquiries pages etc.)	(a) Identity (b) Contact (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests. From the business point of view, it is essential and beneficial for you and the related financial industry to overall keep our clients aware of newest and upcoming trends regarding the world of trading (demo).

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Completion of interrupted registration process	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests, while non-client unable or temporarily unwilling to complete registration process. It is our legitimate interest to contact such non-client to properly distinguish non-clients genuine needs and wants.
Proper performance of a contractual obligation between Company and its (service) providers	(a) Identity (b) Contact (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of a contract with counterparty (b) if Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to able to defend the company status, its interests if necessary or convenient obliged to provide such data to public authorities)
Asserting legal claims and defense in legal disputes, prevention and investigation of criminal offenses creditors or insolvency administrators requesting foreclosures	(a) Identity (b) Contact (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to able to defend the company status, its interests if necessary or convenient obliged to provide such data to public authorities)
Taking pictures and/or video records during seminars, presentations and other (non)public invitation events	(a) Identity (pictures, video)	Necessary for our legitimate interests to present and preserve records from our events
Improvement and evaluation of education services provided by Company and its contractors.	a) Identity b) Contact	a) Necessary for our legitimate interests to provide and to develop our products/services and grow our business b) Performance of a contract with counterparty

Notes to legitimate interest (article 6 (1) f GDPR):

If necessary (and legitimately), we process your data beyond the actual performance of the contract for the protection of legitimate interest of us or third parties.

Legitimacy is considered to match these criteria:

- Identification of legitimate interest  
(legitimate interest is well analyzed and identified as the most appropriate)

- Carrying out of necessity test  
(processing of the data is necessary for fulfilling specified purpose)
- Carrying out of balancing test  
(the legitimate interest does not, in any way, override individual's interests, rights or freedoms and respect also proportional test so you might expect to be contacted by us).

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you do not grant us your consent but you are our Client, we are entitled to send you a commercial newsletter (or give you telemarketing calls) under the conditions of directive 2002/58/EC of the European Parliament and of the Council. In any case, you are entitled to reject such marketing communication simply by (a) opting-out button in the newsletter body, or (b) contacting us at the following email [info@propguru.eu](mailto:info@propguru.eu)

## 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.

We may use the Google Enhanced Conversions tool, which is a feature that allows the offline tracking of conversions. We use it to track performance back to our Google ad campaigns in a secure and privacy compliant way. This helps us improve the accuracy of our conversion measurement, optimize our ad campaigns better and it allows us to measure their effectiveness in order to improve our services. We do not share any personal information with third-parties while using Google Enhanced Conversions.

## THIRD-PARTY MARKETING

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

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by Contacting us at any time at the following email address [info@propguru.eu](mailto:info@propguru.eu). Any third party acting as a controller shall provide you with its own policy.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.



## 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 [info@propguru.eu](mailto:info@propguru.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.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties (such as service providers) 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.

Our service providers and vicarious agents may also receive data for these purposes if they maintain business confidentiality. These companies deliver IT services, logistics, printing services, legal, accounting, telecommunications and consulting as well as sales and marketing.

With regard to the transfer of data to recipients outside of our company, it should first be noted that we commit ourselves to secrecy about all customer-related facts and valuations from which we become aware. In principle, we may only disclose information about you if required by statutory provisions, if you have given your consent, or if we are otherwise authorized to provide information. Under these conditions, in the case of a legal or regulatory obligation, recipients of personal data may be public bodies and institutions (e.g. regulatory authorities, tax authorities, law enforcement authorities).

Other data recipients may be those for whom you have given us your consent to submit the data or to whom we may delegate personal information due to legitimate interests.

## 6. 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 (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 [info@propguru.eu](mailto:info@propguru.eu) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

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 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.

## 8. 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 and litigation 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.

If the processing of your personal data requires consent (such as marketing or other purposes stated herein), the data retention period may differ according its very purpose. If not stated otherwise, your personal data are processed for the period of 5 years or until you withdraw it.

Processing of personal data of service providers defined above takes five years after they cease being service providers.

Processing of personal data of non-clients registered on educative, promotional and inquiry websites may take up to 1 year without granting additional consent from registration or until rejection of such marketing.

Preservation of evidence for other purposes within the statutory limitation period.

If you fail to finish the registration process and/or fail to provide us with necessary documents (ID, POR etc.) we might strive to contact you and seek correction of the registration process. During this period processing of your personal data is bind to this very purpose and after reasonable time, we shall erase your data. This process may take up to 6 months.

Anonymous, not personally tagged pictures from seminars, conferences and other public presentations might be processed for up to 5 years.

Personal data contained in email, chats, phone calls and other means of distant communication might be processed according to the related and relevant purpose specified herein. Processing period might be up to 5 years.

## 9. 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 impacts on 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 at* [info@propguru.eu](mailto:info@propguru.eu)

## 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.

## CHILDREN’S PRIVACY

We do not knowingly collect any information from anyone under 15 years of age. Our websites, products and services are all directed to people who are at least 15 years old or older. If you are under 15, do not use or provide any information on these websites or on or through any of its features / register on the websites, make any purchases through the websites or provide any information about yourself to us, including your name, address, telephone number or



email address. If we learn that we have collected or received personal data from a child under 15, we will delete that information.

#### **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.