



Privacy Policy

V.1.3.1 – Last update- September 2022

Privacy Policy Contents

| | |
|--|----|
| Privacy Notice..... | 1 |
| What we do?..... | 1 |
| Contact Details..... | 1 |
| The General Data Protection Regulation (EU) 2016/679..... | 2 |
| Our status under GDPR..... | 3 |
| What lawful reasons do we use to process personal data?..... | 3 |
| Sensitive personal data..... | 5 |
| What personal information do we collect?..... | 6 |
| Information you give us directly..... | 6 |
| Information we collect automatically..... | 6 |
| What are my rights?..... | 6 |
| What forms of ID will I need to provide in order to access the above?..... | 8 |
| How and where to complain..... | 9 |
| How does GBE brokers use my personal information?..... | 9 |
| Does GBE brokers share my personal data?..... | 10 |
| How long does GBE brokers keep my personal information?..... | 11 |
| How is my data stored?..... | 12 |
| Does GBE brokers transfer my personal information abroad?..... | 12 |
| Contacting you..... | 13 |
| Changes to this privacy statement..... | 13 |

Privacy Notice

This is the privacy statement of GBE Brokers Limited (GBE brokers or We). GBE brokers is a company regulated by the Cyprus Securities and Exchange Commission with CIF licence number 240/14, with its Head Office address at Odos Thessalonikis No 11, 3025 Agia Zoni, Limassol, Cyprus.

GBE brokers is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data We collect from you or that you provide to us, directly or indirectly, will be processed by us. Please read the following Policy carefully to understand our views and practices regarding personal data and how We treat it.

What we do?

GBE brokers is a regulated online broker for private and institutional traders focusing on foreign exchange (FX) and CFD trading.

Contact Details

For more information about privacy and personal data protection or to exercise your personal data protection rights (as explained later) GBE brokers can be contacted at the following address, at compliance@gbebrokers.com and on +357 25281718.

Contact details for Commissioner for Data Protection in Cyprus can be contacted at commissioner@dataprotection.gov.cy.

The General Data Protection Regulation (EU) 2016/679

In this statement we have used certain terms which are set out in the EU's General Data Protection Regulation (GDPR or the Regulation):

personal data means: any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

controller means: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

processor means: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

processing means: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Our status under GDPR

Depending on the nature of the interaction, We may act as a processor in that We are acting upon instructions from controllers when We provide our services to them; and when We control the purposes and means of the processing of personal data, such as processing our employees' personal data, We act as a controller, as defined under GDPR

What lawful reasons do we use to process personal data?

The lawful reasons GBE brokers uses to process personal data are set out in Article 6 of the Regulation and with respect to the business model undertaken by GBE brokers, our processing is lawful given that at least one of the following applies:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes (Consent).
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Contract Performance).
- Processing is necessary for compliance with a legal obligation which We are subject to (Legal Obligations).

- Processing is necessary for the purposes of the legitimate interests pursued by GBE brokers, except where our interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (Legitimate Interest).

Consent

Where We process personal data as a result of data subject consent, We ensure that consent is freely given, specific and informed, and established by a clear affirmative act. Where consent is withdrawn, We have set out (below) how this may be undertaken.

Contract Performance

Where We enter into a contract, processing of personal data may, as a matter of course, be necessary in order to execute such contract or take pre-contract preparation steps.

Legal Obligations

Where We have legal obligations which apply to GBE brokers, processing of personal data may be required by law.

Legitimate Interest

Where We process personal data as it is necessary for the purpose of our legitimate interests, We do so on the basis of a balanced evaluation of our interests and the rights and freedoms of the data subject which require protection. Presently, We have concluded that the way We manage the processing of personal data results in a cumulation of data subject protections which show that the balance is in favour of GBE brokers being able to rely on Article 6.1(f) of the Regulation as a lawful reason to process personal data.

Sensitive personal data

Where We process sensitive personal data, We do so on the basis that We have established a lawful exception to the prohibition on processing sensitive personal data under Article 9 of the Regulation; and where GBE brokers is processing sensitive personal data of employees, it does so pursuant to its employment relationship with its

personnel and so uses the exception set out in paragraph 2(b) of Article 9 of the Regulation.

What personal information do we collect?

We collect and process your personal information in a number of ways, including:

Information you give us directly

- You give us information about yourself when you register for an account with us or for our risk-free demo. Information includes contact details, identity data such as your passport or national identification card, utility bills, age, gender, address details, employment details, financial details, tax information, details of your trading experience and knowledge and payment details such as credit and debit card information. We may also collect personal data about you from publicly available sources.
- You may choose to provide additional information to us when you contact us or otherwise interact with us, including via e-mail, letter, phone or chat function and through your use of our services.

We may keep records of communications when you contact us or otherwise interact with us, including e-mail, letter, online, telephone or live chat function on our platforms. This may include credentials such as passwords, password hints and other security information used for authentication and account access.

Information we collect automatically

When you interact with our services, our servers through your browser cookies and GBE website cookies keep an activity log unique to you which collects certain administrative and traffic information including source IP address, time of access, date of access, language use, software crash reports and type of browser used. More information available on our website – About us – Legal Documentation - Cookies Policy.

What are my rights?

We want to make sure you are fully aware of what your data protection rights are.

The right to know who is responsible for processing of your data and the purpose of your data – Contact details of the relevant department /data protection officer (where applicable).

- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether We are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

The right to access – the data we hold on you and/or related to you

- Identity and the contact details of the person or organisation that has determined how and why to process personal data. In some cases, this will be a representative in the EU.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to
- The right to request GBE for copies of the personal data we hold on you and/or a list documenting what you have provided us with. We may charge you a proportionate fee for this service.
- How long the personal data will be stored.

The right to rectification – You have the right to request that GBE correct any information you believe is inaccurate, incomplete or outdated.

- Details of data subject's rights to correct, erase

The right to object to processing – You have the right to object to GBE processing your personal data, under certain conditions (only if this right does not infringe the right of GBE to carry out its regulatory obligations or any activity under which it is licenced for).

- The purpose of the processing as well as the legal basis for processing.

The right to data portability – You have the right to request that GBE transfer the data that we have collected to another organization, or directly to you, under certain conditions (only if this right does not infringe the right of GBE to carry out its regulatory obligations or any activity under which it is licenced for).

- If the processing is based on the legitimate interests of GBE brokers or a third party, information about those interests.
- If We intend to transfer the personal data to a third country or international organisation, information about how We ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, We will ensure there are specific measures in place to secure information.

The right to withdrawal of consent – you can apply to withdraw your consent and activate the above rights of objection to processing and portability (only if this right does not infringe the right of GBE to carry out its regulatory obligations or any activity under which it is licenced for).

Please note: If you make a request regarding any of the above, we have one month to respond to you.

What forms of ID will I need to provide in order to access the above?

GBE brokers accepts the following forms of ID when information on your personal data is requested: passport, driving licence, birth certificate, utility bill from the previous 3

months. We reserve the right to request further information where your identification is not clear.

Inquiries and complaints

Where you want to contact GBE brokers with your concerns about our processing of your personal data, please contact compliance@gbebrokers.com.

If you are dissatisfied and wish to complain about the way we process your personal data, you can register your concern by contacting the Commissioner for Data Protection at commissioner@dataprotection.gov.cy.

How does GBE brokers use my personal information?

We may use your information for the following purposes:

- To provide a requested service or carry out a contract with you.
- To collect payment, deliver our services to you and to process your transactions.
- To provide you with support and service messages, including messages requesting your feedback on our services and notifying you about changes to our platform, services or changes to our terms, conditions and policies.
- To enforce any contract entered into between you and us for the provision of our services.
- To conduct security and anti-money laundering reviews and to validate your identity, age, the registration information provided by you and to verify your use of our services and your financial transactions.
- To develop and improve our platforms to enhance your experience and personalise our platforms and services for you.
- To improve the quality of the services we provide.

- To monitor accounts to prevent the use of unfair or unlawful practices.
- To ensure effective operational management and internal administration of our business, document retention, compliance with regulatory guidance and exercise or defence of legal claims.
- To protect, investigate and deter against fraudulent, unauthorised or illegal activity.
- In response to requests by government or law enforcement authorities conducting an investigation.
- To fulfil our legal regulatory responsibilities; and when required by our regulator.

Does GBE brokers share my personal data?

We take steps to ensure that our arrangements with third-party suppliers (including online vendors) protect your privacy. We share your necessary personal information in the following circumstances:

- With suppliers and sub-contractors for the performance of a contract including where we engage the services of third-party suppliers to provide technical support and maintain your account with us. Such third parties may include but not limited to providers of platforms hosting, maintenance, marketing, data analysis, research and surveys.
- With analytics and search engine providers that assist us in the improvement and optimisation of our site.
- If GBE brokers or substantially all of its assets are acquired by a third party, in which case personal data held by GBE brokers (in part or in whole) may be one of the transferred assets.
- If We are under a duty to disclose or share personal data to comply with any legal obligation, or in order to enforce or apply our terms and other agreements; or to protect the rights, property, or safety of GBE brokers and its personnel, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- We may share your personal information with third-party electronic payment processors and/or financial institutions to process financial transactions you may undertake.
- We may share your personal information with trusted third-party suppliers of information verification services for the purposes of validating the personal information you provide to us in the course of using our services.
- Where you are found to have attempted to defraud us, our other group companies, or any other user of our services in any way including but not limited to payment fraud, or if we suspect you of fraudulent payment, including use of stolen credit cards, or any other fraudulent activity (including any chargeback or other reversal of a payment) or prohibited transaction (including money laundering). We reserve the right to share this information (together with your identity) with, banks, credit card companies, and appropriate agencies.
- Anyone authorised by you.
- To courts, tribunals, law enforcement or other government agencies, applicable competent authorities as required by law or requested to comply with applicable law for internal investigations and reporting or respond to a valid legal process.

How long does GBE brokers keep my personal information?

Information that we collect will be retained only for as long as is necessary to fulfil the purposes outlined above in this Privacy Notice (this will generally be for the duration of time where you utilise our services) or to comply with our legal obligations. As per statutory retention rules the legal retention period for regulated services We provide is initiated from the end of a business relationship. We may retain your information further, for a period of time specifically required by relevant regulations or laws, such as retaining the information for tax and accounting scrutiny and financial supervision or other authoritative body examination.

When determining the relevant retention periods for your personal information, we will take into account factors including:

- Our contractual obligations and rights in relation to the information involved
- Legal obligation(s) under applicable law(s) to retain data for a certain period of time

- Statute of limitations under applicable law(s)
- Potential disputes
- Guidelines issued by relevant data protection authorities.

Once neither of the above factors is applicable, we securely erase your stored information.

How is my data stored?

GBE securely stores your data both internally on local servers and with a secure ISO 27001:2005 Certified third party responsible for archiving and storing the data you upload and send us via our CRM system during and after your account opening and the course of business with us.

The ISO 27001 certification was awarded following a rigorous auditing process and means the location where the data is being stored has been independently certified and awarded the internationally recognized highest information security standard.

Does GBE brokers transfer my personal information abroad?

We store your personal information on our servers which may be based outside of the European Economic Area. We are often required to transfer data internationally. Accordingly, data about you may be transferred to jurisdictions which are not deemed to be 'adequate' under the Regulation.

Where your personal information is transferred to a country or territory outside the European Economic Area, and where this is to a country that is not subject to an adequacy decision approved by the EU Commission, We will take steps with the aim of ensuring that your privacy information continue to be protected. For example, by using third party's Processor Binding Corporate Rules, Intra-group privacy agreements, EU Commission approved standard contractual clauses or verifying that third parties are certified under an approved certification mechanism according to international privacy rules.

We have implemented security measures that are designed to help protect the personal data We collect or receive in connection with our services from unauthorised access or disclosure. For example, We use encryption techniques to ensure the security of data; We also use password protection. However, no transmission or storage of data can be guaranteed to be completely secure and We therefore cannot ensure or warrant the security of any information which We collect and store.

Contacting you

The personal data We process is subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure. We will get in touch with the supervisory authority (which in GBE brokers' case is the Commissioner for Personal Data Protection located at 1 Iasonos Street, 1082 Nicosia, PO Box 23378, CY-1682 Nicosia; www.dataprotection.gov.cy) and with affected data subjects, where this is required under the Regulation.

Changes to this privacy statement

If We change this privacy statement, We will let you know about the changes by publishing the updated version on our site.