

PRIVACY POLICY

1. About Us

We are Renovato Trading OÜ, a company incorporated in Estonia and operating the <https://renovato.io> website (“**Renovato**”). The data controller is available at support@renovato.io.

This privacy policy governs the collection and use of your personal information by Renovato when you use the Renovato trading platform at the <https://renovato.io> website. Please read it carefully in order to better understand how we collect, process, store and use your personal information.

If you have any question regarding our privacy policy please send an email to our Data Protection Officer, at support@renovato.io.

2. What Information Do We Collect From You And When?

In order to use our trading platform, you will be asked to open an account with us. This account will allow us to monitor your activity on the platform in order to provide you with our services.

When you open an account with us, you will be asked to provide certain types of personal information – such as your name, age, postal address, email address, occupation and bank account details.

When you use our trading platform we further record and document any trading action you perform on the platform, as well as any communication from you to us. We also collect some inferred data which is generated by the device from which you choose to log in to the platform – this includes for example your IP address, the type of device which you use to login to our platform, your browser setting, preferred language and operating system.

When you subscribe to our services via an introducing broker, we also receive some of your personal information from such introducing broker, such as your full name, IP address, email address, phone number. Please refer to such introducing broker's privacy policy in order to better understand what sort of personal information it shares with us.

We receive and gather personal information when interacting with our clients and also from other bodies as part of our service. Such bodies include banks, credit card companies, payment providers, e-wallet providers and identity and verification services.

Please be advised that you are under no legal obligation to provide us with your personal information, but if you choose to use our platform, we would need to collect

some types of your personal information in order to provide you with our services. If you do not provide this personal data, we are not able to provide the services to you. If you do not wish to provide us with such personal information, please refrain from using our platform.

3. What Do We Use Your Information For?

We will only use your personal information in the following ways:

A. To provide you with our services

Your personal information enables us to create an account which is unique to you and which includes all your trading activities. Only on the basis of such an account can we identify you and thus provide you with individual access to our trading platform.

This type of processing of personal information is necessary in order to provide you with our services and perform our contractual obligations towards you, and as part of it we will process your name, contact details (such as postal address and email address), your billing address, login location and date, the history of your trading activities and your communication with us.

B. To comply with applicable regulation

As a trading platform we must comply with certain legal obligations. These require us to routinely assess the money-laundering and terror financing risk potentially present in our platform on the basis of each individual user. Therefore upon registration we will ask you to fill out a detailed Know Your Client form in which you will also be asked to provide your average income, education and occupation. These details allow us to evaluate the risk associated with the provision of our service to you and thus enable us to comply with the relevant regulation.

This type of processing of personal information is necessary in order for us to comply with the legal obligation to which we are subject, including EU and Estonian Anti Money Laundering regulation. As part of this, aside from your name, contact details (such as postal address and email address), billing address, login location and date, the history of your trading activities and your communication with us, we will also collect and store your occupation, average income, age, education.

C. To protect the integrity and security of our systems

In order to provide you with a secure trading experience we must be able to collect certain data about our users. These data allow us to determine whether users abuse the platform or pose risks to other users. For example, we use a Business

Intelligence service to identify users' activity and trading patterns that will allow us to identify suspicious activities and users who tries to manipulate the system.

This type of processing of personal information is necessary for our legitimate business interests, mainly our interest in maintaining a secure and functioning trading platform. As part of this we will process your login date and location, full name, email, phone, personal identification documents

D. To send periodic emails to the email address you provide us with

These emails will contain information and updates pertaining to your account. Upon your express consent, we shall send you marketing materials such as information about new features relevant to you.

Even if you consented to the receipt of our periodic emails, at any time you can opt out of receiving these emails by either:

- clicking on the "Unsubscribe" link which appears at the bottom of every email we send you, or
- opting out of receiving any such periodic emails from us when logging in to your account on our platform.

4. For How Long Do We Keep This Information?

We keep your personal information for as long as you continue to be a subscribed user on our platform and for a period of 7 years following your last interaction with us, unless applicable law requires us to keep it longer. We must do so in order to comply with the anti-money laundering regulation applicable to us in the European Union as a trading platform.

5. Personalization

Another way in which we use your personal information is for the purpose of personalization.

We take your personal information and analyze it in order to make sure you do not pose a high risk with respect to money laundering and terror financing. We do so in order to protect our legitimate interests in maintaining a business which complies with the relevant regulation.

As part of this process we will review all personal information provided by you, and especially our Know Your Client forms we will ask you to complete, in order to categorize the risk associated with you. This process is conducted by third party service providers, which have the appropriate software and staff to perform such analysis.

Depending on the outcome of the process, we may classify you as a high risk user, meaning we will set certain restrictions on your account in order to mitigate any such risk. Such restrictions could for example include a limitation on the amount you can trade with, the number of transactions you may conduct per session, or may require us to ask you to answer additional questions and provide us with more documentation. If we conclude that a user poses a very high risk with respect to money laundering or terror financing which we can't mitigate we will terminate such user's account.

6. How Do We Protect Your Personal Information?

We implement a variety of security measures to maintain the safety of your personal information when you enter or submit any personal information to Renovato:

- A. We offer the use of a secure server and communication. All personal information of our users is transmitted via Secure Socket Layer (SSL) technology, and then encrypted into our database.
- B. We ensure that only our employees or third parties which absolutely must access your personal information as part of their role will be authorized to access it. As part of this, all electronic files containing personal information on our system are password secured and firewall protected from access by unauthorized persons, and we verify the identity of those seeking access to your personal information.
- C. We ensure those authorized employees, or third parties are committed to keep your personal information confidential and secure. Any of our employees which is authorized and seeks to process your personal information must take reasonable measures to protect against unauthorized access or misuse of such personal information. In addition, documents containing your personal information may not be taken from our offices without the prior consent of our Data Protection Officer and must be promptly returned to our offices. Copies of such personal information may only be made as required and all originals and copies of such documents must be disposed of in a way which keeps the personal information confidential and secure.
- D. We dispose of your personal information in a secure way. Our employees must dispose of personal information in a way which will render such personal information practicably unreadable or non- reconstructable, either themselves or by contracting a third party service provider which will be obliged by contract to do dispose of such information securely.

7. Do We Use Cookies?

Yes.

Cookies are small files that our website transfers to your computer which enable our platform to recognize your browser and remember certain information about your

browser and your login information (for example – what type of browser you used to login to our website, the date and time you logged to our website, your browser preferred language etc).

We also use cookies to help us remember and process your trading activities, save your preferences for future visits, and compile aggregated data about platform traffic and interactions, so that we can offer better website experiences and tools in the future. Those cookies are not designed to damage your files, nor can they read information from other files on your computer hard drive.

Such cookies are stored on your browser for a period of 60 days or until you decide to remove such cookies from your browser.

In addition, we contract third party service providers to assist us in gaining a better understanding of the way users visit and use our platform. We do this through the use of such third party service providers' cookies, which are placed on your browser when you log in to our website. Such providers can then analyze your and other users' personal information which is included in such cookies to provide us with valuable insights, such as the average number of visitors to the website or most users' preferred browser language. Please be advised that such third party service providers may use your personal information collected via cookies for their own purposes. For further information regarding the providers we use and their privacy policies and to manage your cookies settings with such providers, please refer to:

Google's Data Privacy and Security:

<https://support.google.com/analytics/answer/6004245>

Google Analytics opt-out browser add-on:

<https://tools.google.com/dlpage/gaoptout?hl=en>

You may also modify how cookies are received by your computer or opt out of such receipt altogether at any point by clicking on the Options menu of your browser or through the links provided below:

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari web](#)

[Cookie settings in iOS](#)

Please be advised however that in light of the integral role cookies play in web - browsing and on our platform, if you choose to modify or opt out of receiving cookies

it may hinder the proper your interaction with our platform and consequently the quality of the services we offer or our ability to offer them at all. We thus strongly suggest that you enable cookies in order to access our website and enjoy our services.

8. Do We Disclose Any Of Your Personal Information To Outside Parties?

A. Third Party Providers

We are assisted by trusted third parties to operate our platform and carry out certain internal tasks on our behalf which are necessary for us in order to provide you with our services. These include:

- billing and account processing companies;
- website infrastructure management;
- analytics service providers;
- identity verification and validation companies;

We also transfer your personal information to our introducing brokers which provide us with customer support services. Upon your explicit consent, we may also transfer your personal information to such introducing brokers to conduct marketing on our behalf.

We will only transfer your personal information to such third party providers inasmuch as such transfer is necessary in order to allow them to provide us with the service we require. Your personal information may not be used by such third party providers for any other use. For example, your credit card details will be analyzed through our billing software which is provided by a third party in order for us to provide you with an invoice when you make a purchase on our platform.

The third party providers mentioned above are located in:

1. the European Union;
2. Israel – which has been granted an adequacy decision by the European Commission, meaning that it is considered to be a ‘safe’ country in Data Protection terms, and it provides an equivalent level of protection to personal data as provided within the European Union.

All third parties with which we share personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way we protect the same. We will not share personal information with third parties that we consider will not provide our clients with the required level of protection, and we will diligently make sure that when

personal information is transferred by us outside of the European Economic Area it will be adequately protected.

B. Affiliates, Partners and Associates

We share personal information we have collected as part of our service with our affiliated companies and companies which provides us with the material services . We do so in the event such information is reasonably required by such affiliate in order for us to provide the products or services to our users.

Only with your **consent**, we may also share personal information with such affiliates in order to offer additional similar products and services that meet our clients' needs and which are delivered in a manner that is useful and relevant, and only where clients have authorised us to do so.

C. Other Forms of Disclosure

In certain circumstances we may also disclose your personal information to outside parties. This could happen if:

1. we believe that under the specific circumstances releasing such personal information will be appropriate in order to comply with any European Union or Member State law applicable to us;
2. we want to protect our legitimate interest and in order to do so we would need to disclose your personal information, and only after we and made sure we can't protect our interest without disclosing your personal information;
3. we need to protect yours or other individuals' vital interests.

No personal information will ever be provided by us to outside parties for marketing, advertising or other such uses without your consent, or where we are obliged to disclose such information by law.

9. Third Party Links

We occasionally include links to third party products or services on our website.

When you elect to link to such linked website you may be asked to provide personal information. Please note the provision of such personal information and what such third parties are allowed to do with it will be governed by a separate and independent privacy policy drafted by such third party, and you should review such privacy policy before you decide whether to provide them with personal information and use the offered service.

Although we are not responsible for the content and activities of such third parties, we do seek to protect the integrity of our trading platform, and would thus welcome

your feedback regarding such third parties if you have any concerns you wish to share with us.

10. Persons Forbidden from Using the Platform

Underage persons or other persons without the legal capacity, or with restricted legal capacity, to enter into a contract are not allowed to register to use the Platform.

We do not target or offer our services to anyone under the age of 18. Please do not use our services if you are younger than 18.

Should we discover that you used our services even though you are in breach of the aforementioned requirements, we shall proceed to terminate your account.

11. Changes to this privacy policy

This privacy policy was last modified on August 2018. If we update this privacy policy in a manner which changes how we collect or use your personal information, the types of personal information we collect or use, or the purposes for such collection or use of personal information, we will notify you accordingly. This will be conducted in two steps:

1. We will send a notification to the email address you provide us with upon registration, in which the new proposed changes will be explained so that you may provide us with your approval; and
2. Following the email notification, in the next time you log in to our platform we will ask you to provide your consent to the new changes.

12. Your Rights

Right to lodge a complaint

If you believe that your right to data protection and privacy has been infringed by us in any way you may contact your relevant supervisory authority in the place where you reside.

Right to Access

You may ask for a copy of your personal information held by us.

If you wish to do so, please contact us at support@renovato.io and we shall provide you with an electronic copy of your personal information as soon as practicable and after we were able to verify the validity of your request and your identity.

We will not be able to provide you with such access if this would adversely affect the rights and freedoms of others, or where the collation and presentation of such data would involve disproportionate cost to us.

Should you require any additional copies we may charge you a fee which shall not exceed the cost for generating copies.

Based on your request we shall also provide you with the following information:

1. the purposes of processing of your personal information;
2. the types of personal data concerned;
3. the entities or individuals with whom we shared your personal information and whether they are located in countries outside of the European Union;
4. the duration of time we keep your personal information (or, if that is not possible, the criteria used to determine such period).

Right to Be Forgotten/Erasure

If you decide you no longer wish to be a member of our website and would like to have all of your personal information which we have deleted, please contact us at support@renovato.io.

We will not be able to delete your personal information if it is necessary:

1. For the fulfilment of any contractual obligations we may have to you;
2. for the exercise of the right to freedom of expression and information;
3. in order to comply with a legal obligation required from us by European Union law or the law of the Member State of the European Union in which we operate;
4. for reasons of public interest;
5. for the establishment, exercise or defense of a legal claim.

Please be advised that following such deletion we will not be able to provide you with our services, and should you wish to rejoin our website you will need to complete a new registration process.

Right to Rectification

At any point during your usage of our platform you may review, amend or update the information you provide us with by logging in to the platform and going to account and profile setting or by sending at support@renovato.io.

Right to Data Portability

You have the right to ask us to provide a copy of your personal information to another provider, in the event that you wish to move your account to them.

If you wish to have such a copy please contact us at support@renovato.io and we shall provide it to you in an electronic and machine readable form so that you may transmit such information to another entity.

If it is technically feasible and should you wish we will transfer such personal information directly to such another entity at your request.

Please be advised we will not be able to provide you with such a copy or transfer such personal information to such an entity if it would adversely affect the rights and freedoms of others.

Right to Restrict Processing

You have the right to request that we restrict processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities. Where we are legally permitted to do so, we may refuse your request.

Right to Object

In certain circumstances you have the right to object to us processing your personal data. Where we are legally permitted to do so, we may refuse your request.