

## PRIVACY POLICY

<b>Effective as of:</b>	10.05.2023
<b>Approved by:</b>	Board of Directors
<b>Operational applicability:</b>	All Personnel and Clients
<b>Geographic applicability:</b>	Cyprus
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## 1. PURPOSE AND SCOPE

Boson Alfa Ltd (hereinafter referred to as the “Company“ and/or “us“ and/or “we“) with its office at 54 Vasileos Georgiou A Str., Galatex Beach Center, Block E2, Office 46 Potamos Germasogeias, 4047, Limassol, Cyprus is the Cyprus Investment Firm (“CIF“) authorized and regulated by the Cyprus Securities and Exchange Commission (“CySEC“) with license No.314/16.

The Company is compliant with the requirements of the Markets in Financial Instruments Directive (MiFID II), Investments Services Law 87(I) 2017, the laws for the Prevention of Money Laundering and Terrorist Financing, Market Abuse and Insider Dealing, the General Data Processing Regulation (GDPR) as well as other legislation applicable in the Republic of Cyprus.

The Company has established this Privacy Policy (“Policy“) in accordance with General Data Processing Regulation and laws, regulations and/or directives issued pursuant to this Law.

This Policy applies to former, existing and potential Clients (hereinafter referred to as the “Client“ and/or “you“) as well as to any visitors of the Company’s website.

**Client** means any natural or legal person who has entered into a client relationship with the Company and is actively using, or has used, the services of our Company until the termination of the Client relationship. A prospective Client is a natural or legal person who intends to use our services and has made the initial registration for such use of services without concluding the Client relationship.

This Privacy Policy:

- provides an overview of how the Company collects, processes and uses your personal data and informs you about your rights under the local data protection law and the EU General Data Protection Regulation;
- is directed to natural persons who are either current or potential Clients of the Company, or are authorized representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or potential Clients of the Company;
- is directed to natural persons who had such a business relationship with the Company in the past;
- contains information about when we share your personal data with other third parties (for example, our service providers or suppliers).

Through this Policy your data may be called either “personal data“ or “personal information“. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing“ such personal data.

For the purposes of this Privacy Policy, **personal data** shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address and identification number.

## 2. COLLECTION OF PERSONAL DATA

The Company shall collect information necessary to fulfil its legal and regulatory obligations for the provision of services and to improve our service to you.

We will gather information and documentation to personally identify, contact or locate you and may gather information from third parties and or other sources which will help us to offer our services effectively.

As a Client, you are responsible for the true and accurate information and to keep us informed of any changes in your personal information or circumstance by emailing us at [info@bosonalfa.com](mailto:info@bosonalfa.com).

We are required to evaluate the appropriateness of the financial instruments and suitability based on three basic parameters:

- The sources of your income and wealth as well as your financial obligations.
- Your investment knowledge and experience including your objectives including your knowledge and experience of the financial markets along with your understanding of the risks involved.
- Your experience in dealing in complex and non-complex financial instruments, especially your investment and risk attitude as they relate to such financial instruments.

The following are the examples of personal data that is required from you:

### **For the performance of an agreement**

The personal data collected from you is used to verify your identity, to construct your economic and investment profile in order to ensure that we provide you with products and services suitable to your requirements, knowledge and risk appetite, to manage your account with us, to process your transactions, to provide you with post-transaction information, to inform you of additional products and/or services relevant to your economic profile, to produce analysis and statistical data which will help us improve our products and services, and for website improvement purposes. These are necessary for the entry into or performance of our agreement once signed. We will carry out regular checks to ensure that our systems are working as intended.

### **For identity verification purposes**

The Company needs to perform its due diligence measures and apply the principles of KYC (Know-Your-Client) before entering a Client relationship in order to prevent actions, such as money laundering or terrorist financing, and also to perform other duties imposed by law. Therefore, we collect from our Clients' identity verification information (such as images of your government issued national ID card or International Passport, or driving license or other governmental proof of identification, as permitted by applicable laws) or other authentication information. We are also requesting our Clients to provide us with a recent Utility Bill in order to verify their address. Further to this, the Company can use third parties which carry out identity checks on its behalf.

### **For compliance with a legal obligation**

There is a number of legal obligations emanating from the relevant laws which we are subject to, as well as statutory requirements. There are also various supervisory authorities whose laws and regulations we are subject to. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. These include amongst others transaction reporting requirements, assessment of Clients' knowledge and experience, FATCA and CRS reporting.

### **For the purposes of safeguarding legitimate interests**

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

- Initiating court proceedings and preparing our defense in litigation procedures,
- Means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,
- Measures to manage business and for further developing products and services,
- The transfer, assignment (whether outright or as security for obligations) and/or sale to one or more persons and/or charge and/or encumbrance over, any or all of the Company's benefits, rights, title or interest under any agreement between the Client and the Company.

### **For Marketing Purposes**

The Company may use Client data, such as location or trading history to deliver any news, reports, campaigns and training opportunities that may interest the Client, to their registered email address. You always have the right to change your option if you no longer wish to receive such communications.

### **Transaction Reporting**

To the extent permitted by MiFID II the Company is required to disclose the following information (if you are an individual) to competent authorities: first name and surname, date of birth and other personal data (national ID number). The transactions will be reported by to CySEC as quickly as possible but not later than the close of the following working day.

## **3. PROCESSING OF PERSONAL DATA**

The Company, and any undertakings being a member of our group, if applicable, agents which we engage with for the purpose of collecting, storing and processing of personal data and any third parties acting on our or their behalf, may collect, process and store personal data provided by you.

For the purpose of processing and the storage of personal data provided by you in any jurisdiction within the European Union or outside of the European Union, the Company can confirm this will be done in accordance with applicable laws.

The Company may also use authorized external processors for Client data processing, based on concluded service agreements, which are governed by instructions from our Company for the protection of Client

related data. The contract is important so that both parties understand their responsibilities and liabilities. The GDPR sets out what needs to be included in the contract which the Company has adhered to, the below is not an exhaustive list of the obligations of all relevant parties;

- Such third parties must only act on the written instructions of the our Company (unless required by law to act without such instructions);
- Ensure that people processing the data are subject to a duty of confidence;
- Take appropriate measures to ensure the security of processing;
- The rights of Clients will not be impaired in meeting the GDPR requirements;
- The security of processing, the notification of personal data breaches and data protection impact assessments will not be impaired;
- Deletion or return of all personal data as requested at the end of the contract.

Third parties will not be promoting our services, products or provide information to Clients or potential Clients regarding the investment and/or ancillary services and financial instruments that we offer.

We have a regulatory obligation to supervise and effectively oversee the outsourced functions and its obligation to take appropriate measures when it determines that the service provider is not performing the said functions effectively and in accordance with the applicable legislation.

We may use or disclose personal information without your consent only in certain circumstances:

- if required by law or by order of a court, administrative agency, or other government entities;
- if there are reasonable grounds showing disclosure is necessary to protect the rights, privacy, property, or safety of users or others;
- if we believe the information is related to a breach of an agreement or violation of the law, that has been, is being, or is about to be committed;
- if it is necessary for fraud protection, risk reduction, or the establishment or collection of funds owed to us;
- if it is necessary to enforce or apply the Terms of Business and other agreements, to pursue remedies, or to limit damages to our Company;
- if the information is public;
- for other reasons allowed or required by law.

When we are required or permitted to disclose information without consent, we will not disclose more information than necessary to fulfil the disclosure purpose.

We inform all Clients about confidentially maintenance and do not share with others thier usernames and private passwords or as provided by us. The Company bears no responsibility for any unlawful or unauthorized use of Clients' personal information due to the misuse or misplacement of Clients' access codes (i.e. passwords /credentials), negligent or malicious, however conducted.

#### **4. USE OF PERSONAL DATA FOR MARKETING ACTIVITIES**

The Company may process your personal data to inform you about products, services and offers that may be interesting to you. The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services, such as information on your transactions. We study all such information to form a view on what we think you may need or what may interest you. In some cases, profiling can be used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so – by clicking on the tick box during the account opening form – or in certain cases, if we consider that it is in our legitimate interest to do so.

Further, you have the option to choose whether you wish to receive marketing related emails (Company news, information about campaigns, the Company's newsletter, the Company's strategic report, etc.) to your provided email address by ticking the relevant tick box during the account opening form.

You have the right to object at any time to the processing of your personal data for marketing purposes or unsubscribe to the provision of marketing related emails by the Company, by contacting us via the following ways:

- By Email: [info@bosonalfa.com](mailto:info@bosonalfa.com)
- By post or in person at the Company's Headquarters at:  
***54 Vasileos Georgiou A Str., Galatex Beach Center, Block E2, Office 46, Potamos Germasogeias, 4047 Limassol, Cyprus***

#### **5. PERIOD OF KEEPING CLIENTS PERSONAL INFORMATION**

The Company will keep your personal data for as long as a business relationship exists with you, either as an individual or in respect of our dealings with a legal entity you are authorized to represent or as the beneficial owner. Once the business relationship with you has ended, we are required to keep your data for a maximum period of five years to meet our regulatory and legal requirements.

If reasonably necessary or required to meet other legal, contractual or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also keep for an additional three years some of your information as required, even after the above-mentioned period.

When we no longer need personal data, we securely delete or destroy it.

#### **6. CLIENT RIGHTS**

##### **RIGHT TO ACCESS**

You have the right to request copies of your personal data. Information must be provided without delay

and at the latest within one month of receipt. The Company will be able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

We must provide a copy of the information free of charge. However, the Company can charge a “reasonable fee” when a request is manifestly unfounded or excessive, particularly if it is repetitive. The fee if applied will be based on the administrative cost of providing the information.

If at any time we refuse to respond to a request, we will explain why to the individuals, informing them of their right to complaint to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

The Company will verify the identity of the person making the request, using reasonable means.

#### RIGHT FOR RECTIFICATION

The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing.

If we have disclosed the personal data in question to others, we must contact each recipient and inform them of the rectification - unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the individuals about these recipients.

We must respond within one month after your request for rectification has been submitted. This can be extended by two months where the request for rectification is complex.

Where the Company is not taking action in response to a request for rectification, we must explain why to the individuals, informing them of their right to complain to the supervisory authority and to a judicial remedy.

#### RIGHT TO ERASURE

The right to erasure does not provide an absolute ‘right to be forgotten’. Individuals have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the individual withdraws consent.
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
- The personal data has to be erased in order to comply with a legal obligation.
- The personal data is processed in relation to the offer of information society services to a child.



There are some specific circumstances where the right to erasure does not apply and we can refuse to deal with a request.

We can refuse to comply with a request for erasure where the personal data is processed for the following reasons:

- to comply with a legal obligation for the performance of a public interest task or exercise of official authority.
- the exercise or defense of legal claims.

If we have disclosed the personal data in question to others, we must contact each recipient and inform them of the erasure of the personal data - unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the individuals about these recipients.

#### RIGHT TO RESTRICT PROCESSING

We will be required to restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, we should restrict the processing until you have verified the accuracy of the personal data.
- Where an individual has objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our Company's legitimate grounds override those of the individual.
- When processing is unlawful, and the individual opposes erasure and requests restriction instead.
- If the Company no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim.

We may need to review procedures to ensure we are able to determine where we may be required to restrict the processing of personal data.

If the Company has disclosed the personal data in question to others, we must contact each recipient and inform them of the restriction on the processing of the personal data - unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the individuals about these recipients.

The Company must inform individuals when we decide to lift a restriction on processing.

#### RIGHT TO CONSENT

Initial registration - In order to create a Demo account or a Live trading account with the Company, if applicable, a person must make an initial registration via the website's registration form and agree with the terms listed in the given Privacy Policy. The Client confirms acceptance of these terms by ticking the corresponding box on the registration form. If such consent is not given, the Company cannot

process a persons' data and provide any services to the person in question.

Cancellation of the initial registration - When a person cancels the registration process and does not complete it, that person's data will not be retrieved by the Company and will, therefore, not be saved for further processing in the future.

Declining the option to be contacted via phone - A person always has the right to request not to be contacted via telephone by the Company's representative. This request will be saved within the Company's internal systems and acts as a separate restriction which we will, of course, respect. The request to not to be contacted via telephone does not affect a Client from using our services. Additionally, this does not restrict said person to contact the Company by their own initiative.

#### RIGHT TO DATA PORTABILITY

- The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- It enables Clients to take advantage of applications and services which can use this data to find them a better deal or help them understand their spending habits.
- We will respond without undue delay, and within one month. This can be extended by two months where the request is complex or where the Company may receive a number of requests. We will inform the individual within one month of the receipt of request and explain why the extension is necessary, if applicable.
- Where we are not taking action in response to a request, we will explain why to the individuals, informing them of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

#### RIGHT TO OBJECT

Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling);
- processing for purposes of scientific/historical research and statistics.

We will stop processing the personal data unless:

- We can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise or defense of legal claims.

## RAISING A CONCERN

You have the right to be confident that we handle your personal information responsibly and in line with good practice.

If you have a concern about the way we are handling your information, for example if you feel we may not be keeping your information secure or holding inaccurate information about you or have disclosed information about you or keeping information about you for longer than is necessary or have collected information for one reason and are using it for something else you can contact us. We take all concerns seriously and will work with you to resolve any such concerns.

Any concerns and/or requests can be raised to the appointed Data Protection Officer whose contact details are below:

### **Boson Alfa Ltd**

Address:

54 Vasileos Georgiou A Str., Galatex Beach Center, Block E2,  
Office 46 Potamos Germasogeias, 4047 Limassol, Cyprus

Tel: +357 25558225

Email: [e.christodoulou@bosonalfa.com](mailto:e.christodoulou@bosonalfa.com)

If you are not satisfied with any responses provided by us, you have the right to raise such matters with the **Cyprus Data Protection Commissioner**

Office of the Commissioner for Personal Data

Protection 1 Iasonos str., 1082 Nicosia

P.O. Box 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

## 7. OTHER IMPORTANT INFORMATION

### **Automated decision-making**

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform an agreement with you, for data assessments (including on payment transactions) which are carried out in the context of combating money laundering and fraud. An account may be detected as being used in a way that is unusual for you or your business. These measures may also serve to protect you.

### **The Geographical Area of Processing**

As a general rule, the Client data is processed within the European Union/European Economic Area (EU/EEA), but in some cases it is transferred to and processed in countries outside the EU/EEA.

The transfer and processing of Client data outside the EU/EEA can take place provided there are

appropriate safeguards in place and the actions are made based on a legal basis only.

Upon request, the Client may receive further details on Client data transfers to countries outside the EU/EEA.

### **Security**

We use appropriate technical, organizational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration and destruction. Unfortunately, the Company cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

Among other practices, your account, if applicable, is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Transmission of information via regular email exchange is not always completely secure. The Company however exercises all possible actions to protect Clients' personal data, yet it cannot guarantee the security of Client data that is transmitted via email; any transmission is at the Clients' own risk. Once the Company has received the Client information it will use procedures and security features in an attempt to prevent unauthorized access.

When you email the Company (via the "Contact Us" page), or using the Live Chat feature, when applicable, a person may be requested to provide some additional personal data, like the name or email address. Such data will be used to respond to the query and to verify the identity. Emails will be stored on our standard internal contact systems which are secure and cannot be accessed by unauthorized external parties.

### **Cookies**

For almost any modern website to work properly, it needs to collect certain basic information on its users. To do this, a site will create files known as cookies – which are small text files – on its users' computers. These cookies are designed to allow the website to recognize its users on subsequent visits or to authorize other designated websites to recognize these users for a particular purpose.

Cookies do a lot of jobs which make your experience of the internet much smoother and more interactive. For instance, they are used to remember your preferences on sites you visit often, to remember your user ID and the contents of your shopping baskets and to help you navigate between pages more efficiently. They also help to ensure that the advertisements that you see online are more relevant to you and your interests. Some data collected is designed to detect browsing patterns and approximate geographical location to improve user experience.

We use cookies on the website for our own internal purposes, to track how users navigate through the website. This helps us to evaluate and improve the Company's website and our online services.

We use information derived from cookies in order to:

- Complete statistics on how our website is being used, which can help us to improve our website and online services.
- Facilitate users' ability to navigate through the website.
- Ascertain whether the website is operating effectively.
- Personalize and improve the service we offer to you by understanding your preferences and establishing which areas of the website are most relevant to you.

We also use cookie technology with our online registration forms, if applicable, to ensure we maintain your confidentiality and security as you move through secure or password protected areas of our website.

## **8. MONITORING AND REVIEW**

The Company will monitor the effectiveness of this Policy on a regular basis, at least annually. The review will also be carried out whenever any material changes occur.

The existing Clients will be notified of any material changes or amendments to this Policy which may be made from time to time. The latest version of the document will also be available at [www.bosonalfa.com](http://www.bosonalfa.com).