

# EZInvest

## PRIVACY POLICY

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# WGM Services Ltd Privacy Policy

The entire team here at WGM Services Ltd cares and respects your privacy. From this point on, we will refer to WGM Services Ltd as “us”, “our”, “we”, and “WGM”. We will also use contractions, e.g. “we’ll”, “we’re”, etc. When we’re referring to the reader of this privacy policy - you - , we’re going to refer to you as “you”, and we’ll also use contractions such as “you’re”, “you’ll”, etc.

Our care and respect extends to the privacy of all of our customers, partners, and website visitors who come to [www.ezinvest.com](http://www.ezinvest.com)

We collect and use any personal data in the following ways. Before we get onto discussing the “ways in which we collect and use personal data”, we do want you to know that everything that’s described within this privacy policy is extremely consistent with our obligations, and even more importantly, your rights under the law of the Republic of Cyprus.

## 1.0 Information about us – WGM Services Ltd

WGM Services Ltd is our company name.

### 1.1 What is WGM Services Limited?

WGM Services Ltd is our company name.

### 1.2 Where is WGM Services Ltd based?

WGM Services Ltd is based on the island of Cyprus, and our registered address is 48 Themistokli Dervi Avenue, Unit 104, Nicosia, CY-1066. The WGM Services Ltd company registration number is HE 256991

## 2.0 What our privacy policy covers

We’ve carefully put together this privacy policy so that you can better understand how we use your personal data. Within this policy, we cover GDPR and explain how we adhere to the GDPR laws.

### 2.1 Third-party apps

Within our privacy policy, we are going to show you how we use third-party apps to collect data, and we will be discussing which third-party apps we use on our website. We also collect data via offline methods and will cover that here too. We’re also going to be telling you how your data is stored by us, and how we process your data.

### 2.2 Your rights under law

Our privacy policy will then go on to explain your rights under the law that relates to your personal data. As we’re based in Cyprus, we adhere to the laws of the Republic of Cyprus. As the Republic of Cyprus is in the EU, we have to comply with EU law, which also means complying with GDPR and ensuring we are compliant. We’ll get to GDPR in just a moment.

## 3.0 What is personal data?

As we’ve just mentioned, WGM Services Ltd is based in the EU, and so we need to comply with all EU laws. The EU handbook says the following with regards to “Personal Data”:

***“Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.”***

That sentence is taken from the General Data Protection Regulation – EU Regulation 2016/679, under the GDPR section.

To simplify what personal data is, we can say that personal data is any information about you that allows you to be identified online or offline. When it comes to personal data, we’re relating to data such as your full name and contact details, but that’s only a part of your personal data. For instance, any personal data such as any identification numbers that belong to you are also covered as being part of your personal data. Here’s a small sample of your personal data:

Your passport numbers

Your national identity

card Electronic location

data

Any other online identifiers such as your

email The personal data that we use is set

out in Part 5

## **4.0 What are my rights?**

### **4.1 What is GDPR?**

As we mentioned in part 3, GDPR is the latest upgrade on the personal data act. GDPR is an acronym for General Data Protection Regulation. In this section, we’re going to talk about your rights and give you a quick tour on how GDPR relates to you.

Wikipedia tell us the following about GDPR:

***“The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA).”***

To simplify the above, we’ll provide an example. If you live in the European Union, your personal data is now protected under GDPR, which is a law. The important aspect to take away from this is that even if the website you’re visiting isn’t hosted on servers within the EU, you’re still covered by GDPR. If you’re an EU citizen you’re covered by GDPR. Everyone here at WGM always does everything we can to ensure your personal rights are upheld.

### **4.2 Your rights under GDPR**

Here are your rights under GDPR:

- You have the right to be informed about our collection and use of your personal data.
- You have every right to access the personal data we hold about you, and in part 10, we explain this further.
- You have the right to restrict or prevent the processing of your personal data.
- You have every right to make changes to your personal data. If, for instance, it’s wrong or simply incomplete, you can get in touch with us using the contact details we’ve added to part 11 of this WGM privacy policy.
- You have the right to have your personal data completely removed from our servers.
- You have the right to object to us using your personal data for a specific reason. For instance, we might want to email you, but you might not want to receive an email from us. It’s your right to stop us and any other EU company from

sending you email or any other correspondence

### 4.3 What is Data Portability?

You have the right to data portability, which basically means that you have provided your personal data to us directly, either via a website form or because you've physically filled in a form. We then use your data with your consent or for the performance of a contract, and that data is processed using a form of automation or an automated means. Therefore, by having a right to data portability, it means you can ask us for a copy of that personal data so that you can reuse it with another service or business. It's a requirement under GDPR that we provide this for you within one month of you requesting it.

You have rights that relate to automated decision-making and profiling. We discuss this in more detail in part 6 of this privacy policy, where we explain how we use your personal data for automated decision-making and profiling.

If you would like to know more about our use of your personal data, simply get in touch with us using the contact details we've added to part 11.

You can find out more about your personal data rights by visiting your local Citizens Advice Bureau (they're called Citizens Service Centres here in Cyprus, or Κέντρο Εξυπηρέτησης του Πολίτη).

Before we end part 4, we do need to tell you that if you have any cause for complaint about our use of your personal data, you are free to file a complaint with the GDPR Officer at your local Citizens Advice Bureau or Citizen Service Centre. The entire team here at WGM wishes that you never feel you need to take those measures, but it's your right to do so.

## 5.0 What personal data do we collect here at WGM?

When it comes to collecting your personal data, the data we're collecting from you really does depend on the relationship you have with us. For instance, if you're a customer, e.g. a trader that uses our spreads, commissions and trading platforms, the personal data we're getting from you is quite different than the data we're getting from a website visitor who peruses through EZInvest, but never fills in a form on our website or a landing page.

### 5.1 The list of personal data we store

Here's an extensive list of the personal data we'll collect and store here at WGM:

- Your full name
- Your email address
- Your business name
- Your job title
- Your professional experience in the form of the content that's within any CV you upload to our website
- Cookies

## 6.0 How does WGM use my personal data?

Under GDPR, it's really important for us to have a lawful basis for using your personal data. It takes time and resources to store your data, so we are storing it because we need it, not just because we want to. One of the main reasons we store and use your personal data is so that we can reach out to you and service your needs. It's also in our interests to use your data so

that we can, for example, contact you and provide you with trading services, trading account statements, and promotional material which is selectively provided to suit your needs.

## 6.1 How your personal data might be used by WGM

Here's how your personal data might be used by WGM:

- Your personal data allows us to manage your trading account.
- It allows us to provide you with marketing material and services.
- We use your personal details so that we can enter into a contract with you, which is a requirement as per our [terms and conditions](#).
- We use your data to personalize and tailor our trading products or services for you.
- We use your data to communicate with you via email and even the phone.
  - When we do email you, it's because you've opted-in to receiving emails from us.

You can unsubscribe or opt-out by clicking on the "unsubscribe" link, which is at the bottom of every email we send out. You

can also email us [gdpr@wgm.com](mailto:gdpr@wgm.com) too.

## 6.2 Spam isn't something we do at WGM

We'll never send you any spam emails. We're always looking at new and improved ways on how to better protect your personal data rights. As you've noticed, we comply with our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations of 2003, plus you'll always have the opportunity to opt-out of anything we're offering via email.

We still need to use automated systems to help us carry out all sorts of client profiling, such as Google Analytics, HelpScout, Insightly, and Survey Monkey.

## 6.3 Automated profiling

If you'd prefer a human touch to profiling yourself, under GDPR, you're given the right to do so. All you need to do is contact us using the details in part 11.

- The following automated profiling may take place if you have:
  1. Opted-in to receive cookies via our website <https://www.ezinvest.com> or via our landing pages, then, depending on how you interact with our site, you may see targeted EZInvest ads.
  2. Seen text and display ads on search engines such as Google's and Bing's search results pages. In other cases, you might see our banner ads on a whole host of third-party websites too.

Seen our banner ads, which are served via the Google Display Network, Bing Display Network, Outbrain, Taboola, and AdRoll on websites which have opted to display our banner ads.

## 7.0 How long does WGM keep my personal data?

The previous data protections act allowed companies to store your data for what seemed to be an eternity. Under GDPR, we'll only keep your personal data for as long as we need to, with the duration depending on the reason we collected your personal data in the first place.

## 7.1 Keeping your personal data

To better understand this, let's take a closer look at how long we keep your data, and for what reason:

- Cookies will be kept for a maximum of 540 days, but this duration can be reset if you visit our website or partner websites that are used as sub-domains, e.g. <https://www.ezinvest.com>
- When it comes to email addresses, we store them for as long as we think they're useful, or until you opt-out or unsubscribe.

## 8.0 Where do you store my personal data and how do you store it?

In this section, we'll show you where we store your personal data, as well as show you how we store it.

### 8.1 Storing your data in the EEA

Wherever possible, we'll only store or transfer your personal data within the EEA (European Economic Area). The EEA is made up of all EU member states, as well as Norway, Iceland, and Liechtenstein. If we store your data on servers within the EEA, your personal data qualifies under GDPR, or to equivalent standards by law.

### 8.2 Storing your data outside of the EEA

There's a chance that we'll transfer your data to the United States of America, and we'll only transfer your data to a third-party based in the USA if they're part of the EU-US Privacy Shield. There's no cause for alarm when it comes to us transferring your data to a third-party in the USA as the third-party companies we use provide data protection to the same standards as us. If you want to read more about this, check out this info from the [European Commission](#), which discusses the transference of personal data.

If you'd like to know more about how we transfer your personal data to third-parties, our contact details are listed in part 11.

### 8.3 More info on your personal data

Here's some more info you might be interested in:

1. We only retain your personal data for as long as is necessary, and we won't hold onto it for a second longer than is required.
2. Access to personal data is restricted to specific team members here at WGM. We don't provide access to your personal data to every member of staff, only those that have been granted specific access.
3. We keep a record of exactly what personal data we store and process.

## 9.0 Does WGM share my personal data?

Yes, but we only share your personal data with other companies in our group (WGM Services Ltd) for marketing purposes. We'll only get in touch with you if we feel one of WGM's brands can help you with your trades.

### 9.1 Sharing your personal data with third-party companies

There is a chance of us signing contracts with third-parties on our behalf. The companies we partner with include payment processing, delivery, and marketing companies, which are listed below in section 9.2.



We've worked with these companies for years and we trust them. We do need to tell you that some of these third-party companies might need access to some or all of your personal data that we've stored.

## 9.2 The list of companies we share your personal data with

Here's a list of the companies we're happy to partner with:

- Google – we may share your personal data for online marketing reasons.
- Twitter – we may share your personal data for online marketing reasons.
- LinkedIn – we may share your personal data for online marketing reasons.
- Facebook – we may share your personal data for online marketing reasons.
- Microsoft – we may share your personal data for online marketing reasons.
- Sendgrid – same as MailChimp and Silverpop as Sendgrid is an email service.

If one of the above third-party companies we partner with needs some or all of your personal data, we'll take the necessary steps to make sure your personal data is handled securely, but more importantly, in accordance with your rights, our obligations, and the third-party's obligations under the law, as we discussed in Part 8.

If we need to transfer any of your personal data outside of the EEA, we'll take suitable steps to ensure that all your personal data is treated just as safely and securely as it would be within Cyprus and under the GDPR.

Your personal data is paramount to us and we would never transfer it to any entity unless we were 100% sure that they abide by all the known personal data laws.

In some cases, we might be legally required to share your personal data if we're involved in a legal case. For instance, we might need to hand over your personal data if we receive a court order, or an order from a government authority. We will always battle to hold onto your personal data and will only ever hand it over if it's absolutely necessary.

## 10.0 How can I access my personal data if you're storing it?

### 10.1 What is SAR?

If you're curious as to your own personal data that we've stored, you can ask us for an SAR, which stands for Subject Access Request. We'll send you over a copy of your personal data within 28 days of your SAR. If there are any difficulties in us issuing you the SAR, we'll be in touch and let you know.

To activate a SAR, check out our contact details in part 11.

We won't charge you for issuing a SAR, unless you overdo it and ask us to issue a SAR repeatedly. If you do this, we will charge you €49.95 per SAR, as it takes time for us to perform a SAR.

## 11.0 How do I contact WGM about my personal data?

You can reach out to us with regard to your personal data and data protection by emailing us using the following details: Email address:

- Email address: [gdpr@wgmservices.com](mailto:gdpr@wgmservices.com)
- Telephone number: +357 22 000878.
- Postal Address: 11 Vyzantiou Street, Office 401, Strovolos, CY-2064 Nicosia

## **12.0 What happens if you make changes to your privacy policy?**

As time goes by, certain laws and procedures change, and those changes might be reflected within this privacy policy.

### **12.1 Where you can find our updated privacy policy**

If we do update our privacy policy, we'll simply update it here, on our website – <https://www.ezinvest.com/Company-Policies> and we'll also email you, letting you know that we've got a newer version.