



Solid Financial Services Ltd

Privacy Policy

Ver: 01/2019

This Privacy Policy describes how Solid Financial Services Ltd (“The Company”) collects and uses information through its approved domains and any other related sites and applications. This Privacy Policy does not apply to websites operated by other organizations and other third parties.

Solid Financial Services Ltd is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus; therefore, any clients’ personal data is kept by The Company according to the Processing of Personal Data (Protection of the Individual) Law of 2001, its amendment (Law No. 37(I)/2003) and the Processing of Personal Data (Protection of Individual) (Amending) Law of 2012 (Law No. 105(I)/2012) and the Regulation of Electronic Communications.

1. Company Commitment

The Company respects the privacy of any user that accesses its websites and understand the importance of maintaining the confidentiality and privacy of users information, therefore, we are committed in taking all reasonable steps in safeguarding any existing or prospective clients, applicants and visitors.

2. Data collection

In order to open an account with The Company, you must first complete and send an application form with certain information that we will require from you in order to do so. By completing the application form you are requested to disclose private information in order to enable us to evaluate your application and comply with relevant rules and regulations. This information may also be used by The Company to inform you regarding its services.

Moreover, information about you may also be collected by any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website, subscribe to our service or any other activities carried out on our website or any connected applications. We may also collect your information in regard to your use of our websites, such as pages visited, frequency, duration of visit and trading activities.

3. Use of the data collected

The Company will use, store, process and handle Your personal data (in case you are a natural person) in connection with the furthering of the Agreement between us, in accordance to the Processing of Personal Data (Protection of the Individual) Law of 2001.

Data provided by You which we hold is to be treated by us as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of our services to you.

The personal information that you provide in connection with registering yourself as a user of our websites or of the services can be used only in relation of the furthering of our Agreement between us, establishing and managing your account or a relationship between us, reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or

opportunities that we believe may be relevant to you, improving our relationship, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes (according to the Agreement between us), as applicable.

4. Choice/Opt-out

We may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or pop-up.

If you agree, we or any of our Affiliates of the Company or any other company in our group, may make contact with you from time to time, by telephone, fax, email or pop-up for marketing purposes to bring to your attention products or services that may be of interest to you or to conduct market research.

If you no longer wish to receive any communication from The Company, you may opt-out of by following the relevant instructions included in each communication sent to you. Company reserves the right to contact you, albeit the fact that you have opted out, in cases where The Company deems such contact as necessary.

5. Security and protection of your data

The personal information that you provide in connection with registering yourself as a user of the portal or of the services is classified as 'Personal Information'. 'Personal Information' is protected in many ways. You can access your 'Personal Information' through a username and password selected by you. It is your responsibility to ensure that your password is encrypted and known only to you. Your password must not be revealed to anyone.

Personal Information is safely stored on secure servers that only authorized personnel have access to via a username and password. The Company protect the information that holds, in particular:

- we hold personal information in secure facilities and where the information is held electronically, on secure servers;
- we use encrypted transmission links whenever we can;
- we use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorized access to systems and data;
- we regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems; and
- we restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined, or their contract terminated if they fail to meet these obligations.

6. Disclosure of data

We will not share your personal information with third parties for their own independent marketing or business purposes without your consent. However, we may share your personal information with:

- any member of our group, which means any subsidiaries, ultimate holding companies and its respective subsidiaries may receive such information;
- we may also share your information with certain third parties including business partners, suppliers and sub-contractors and advertisers;
- service providers who provide you with services through us such as your referring broker, money manager and signal providers;
- service providers such as cloud-based providers with high security standards;
- service providers that provide services for or on behalf of us, such as companies that help us with data or that verify your identity. These entities are limited in their ability to use your information for purposes other than providing services for us;
- other parties in connection with corporate transactions including a sale or transfer of our company or a business unit, or in the event of a bankruptcy; and
- other parties with your consent or at your direction, an example of the latter being instances where you ask us to send your information to your professional advisors, and
- other parties when required by law or as necessary to protect our services, including instances:
 - a) to comply with the law or respond to compulsory legal process (such as a search warrant or other court order);
 - b) to verify or enforce compliance with the policies governing our services; and
 - c) to protect our rights, property, or safety, or any of our respective affiliates, business partners, or customers;

In the event that The Company discloses information to business parties, for instance, card processing companies or banks, in order to affect the services requested by the clients; such third parties may store your information in order to comply with their legal and other obligations.

7. Access and changes of your data

In compliance with the Law, every user has the multiple rights including accessing and/or amending his personal information, putting a stop to the processing on this data and preventing undesirable marketing.

Subject to the Law, each Company user has the right to request from The Company to correct and/or delete any personal information of him which is inaccurate, irrelevant, excessive, out of data, incomplete, misleading or obtained unlawfully. Moreover, user has the right to request

to delete and/or destroy a record of personal information if the Company is no longer authorized to retain such information.

We endeavor to ensure that the personal information we hold is accurate and up-to-date. We are aware that this information changes frequently with changes of address and other personal circumstances. We may reach out to you from time to time to ask you to update your information or confirm that your information is up to date.

8. Contact

If you have any questions regarding this policy, wish to access or change your information or have a complaint, you may contact us at solid@solid.com.cy

9. Privacy Policy updates

The Company reserve the right to update Privacy Policy without prior notice. If we decide to change our privacy policy, we will communicate it to you in a way we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.