Data Protection Policy

1. Introduction

INVESTAGO (hereinafter „Investago“) is registered brand name of the company WONDERINTEREST TRADING LTD.

WONDERINTEREST TRADING LTD (hereinafter the “Investment Firm”), is committed to protect your privacy and handle your data through a transparent manner. The Investment Firm understands the importance of maintaining the confidentiality and privacy of your personal data. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security, and integrity of Your Information.

2. Data Protection Policy

This Data Protection Policy aims to provide you an overview of how the Investment Firm collects and processes your personal data and informs you about your rights under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – hereinafter „GDPR“), as well as the Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) (hereinafter „the Laws“) as amended from time to time. This statement is directed to natural persons who are either current, past or potential clients of the Investment Firm and their representatives (such as attorneys acting on their behalf).

3. About us

The Investment Firm is an authorized company, established in Cyprus, with registration number 332830.

The Investment Firm is registered and licensed by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) with license number 307/16.

Investment Firm has registered Tied Agents under its name which are established in European Union The said Tied Agents are working exclusively for the Investment Firm. Each Tied Agent shall have its own Privacy Statement which shall be published on its website that may be linked and/or refer to the Investment Firm’s website and/or name.

If you have any questions or want more details about how the Investment Firm uses your personal information, you can contact our Data Protection team at dataprotection@wonderinterest.com.

4. Legal Basis

There are various reasons why we may legitimately collect and process your personal data and they are called legal basis. We rely on different legal basis depending on reason for which we process the data. We use following legal grounds as a basis for processing personal data:

Contractual obligations – where it is necessary to either enter into a contract with you for the provision of our products or to perform our obligations under the contract or to provide you with advice in relation to our products.

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Compliance with legal obligations – if it is required by the law or by the regulator, we may need to collect and process your data and also provide the regulator with the data.

Legitimate interests – where the processing is required for running our business. It includes managing business, financial and administrative issues, to protect our customers, employees and property. It is in our interests to ensure that our processes and systems operate effectively and that we can continue providing services.

Consent - the processing of your data upon your consent is rare, but we may use it in specific situations. For those purposes, we collect only freely given, specified, informed and unambiguous consent, collected prior to processing.

5. Purposes for processing

We may use the Personal Data we collect from and about you for the purposes set forth below.

Opening an account and providing services

- Considering an application for account opening
- Carrying our risk assessment
- Obtaining information about your relevant investment knowledge and experience so that we can assess whether the service is appropriate for you

Administering our relationship with you including support

- Contact on matters related to your account
- Provide you with notices related to your account, general updates and market updates
- Reviewing your ongoing needs
- Replying to your queries

Complying with our legal and regulatory obligations

- Verifying your identity and carry out checks
- Screening compliance
- Recording obligations
- Performing anti-money laundering, terrorism prevention and sanctions careening checks, complaints and investigations or litigation
- Perform “know your customer” procedure
- Provide information about you and your trading with us to relevant authorities

Perform financial transactions

- Deposits

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- Withdrawals
- Chargebacks
- Any other payments

Monitor and assess compliance

- Monitor whether the provision of our services complies with our policies, standards and with legal requirements
- Monitor the behaviour of or employees during the communication with clients or potential clients

Generate statistical data and analyse business

- Manage Company' s business strategy

Develop and market products

- Tailor the products and services offered
- Undertaking product development and analysis

Protect security

- Protect the security and access to our premises and systems
- Detecting and preventing fraud and other malicious activities

6. Collection of Information

When you Register for Services

The Company may collect the said information directly from you (during the account opening procedure) and/or from other persons including for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers (for example by using Lexis-Nexis for authentication purposes and background purposes) and the providers of public registers.

Information about you Use of Services

The Company may also collect Your Information in regard to your use of our website(s), such as -

Financial Information

a. Services you use, products you trade and their performance

b. Historical data about the trades and investments you have made including the amount invested

c. Historical data about your payment activities, trading account balances and your withdrawal activities.

- Log Information
- Device Information

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- Location
- On-site Activity
- Cookies and other tracking technologies

Information contained in obligatory recordings.

The Investment Firm records any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services that were provided by the Investment Firm to you and the relationship with you. The said recordings will be the Investment Firm's sole property and will constitute evidence of the communications between the Investment Firm and you.

As part of the Investment Firm's trading account opening procedures and ongoing obligations, it needs to abide with the legislative framework currently in place with the Cyprus Securities and Exchange Commission ('CySEC'). Specifically, the Investment Firm shall comply with its legal obligations under the Prevention and Suppression of Money Laundering Activities Laws of 2007-2019, as amended, for the establishment on the Client's economic profile and prevention of money-laundering as well as abide with the relevant record keeping obligations under the European Commission Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organizational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive ('Delegated Regulation') and Law regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets N. 87(I)/2017 for establishing the suitability and appropriateness of each Client based on the services offered by each CIF (Suitability & Appropriateness Tests) and recordings of telephone conversations, client transactions, the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS).

7. Categories of data

The Company based to the above-mentioned, collects and maintain the following categories and types of personal data:

Contact Information

- Name and Surname
- Email address
- Telephone number
- Utility bill

Payment and tax information

- IBAN
- Tax Identification Number
- Tax residence

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Personal Information

- Date of birth
- Place of birth
- Nationality
- Copies of ID, passport, driving license or other identification document

Professional Information

- Employer's name
- Profession
- Industry of Employment

Financial Information

- Gross Annual Income
- Net Worth
- Anticipated amount to invest
- Knowledge and experience

8. Data Recipients

As part of using your personal information for the purposes set put above, we may disclose your information to:

a) Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services.
b) Tied Agents with whom the Investment Firm has closed relationships and who are exclusively working for the Investment Firm .
c) Regulatory Authorities.
d) Anyone authorized by you.
e) Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
f) Trade Repository or similar.
g) The Investment Firm's employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.

The Investment Firm requires from third parties who handle or obtain personal information on behalf of the Investment Firm in order to comply with their contractual obligations with us to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy notice.

9. Use of the Information

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The Investment Firm will use, store, process and handle Your Personal Data in accordance with GDPR and the Law, as amended or replaced from time to time.

Your personal data (not publicly available information and/or already possessed by the Investment Firm without abiding with the provisions of the general data protection regulation), will be collected and processed explicitly and specifically only for the purposes that have been collected for ('purpose limitation') while the Investment Firm must require only the information necessary in relation to the purposes for which they have been collected.

We may transfer your personal information outside the European Economic Area. If we will make such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by Applicable Regulations.

10. Data retention period

The Investment Firm shall retain your personal data for as long as the Investment Firm has a business relationship with you. Once the business relationship has been ended, we may keep your data for up to five (5) years in accordance with the Laws governing the Investment Firm. The Investment Firm may keep your personal data for longer than five (5) years for legal, regulatory and/or any other obligatory reason.

Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

11. Organizational and security Measures

The Investment Firm has taken all the appropriate organizational measures to ensure that your personal data are secured. Moreover, the Investment Firm has established an Internal Educational Training for its employees. The employees that are processing your data are being trained to respect the confidentiality of customer information and the privacy of individuals. We consider breaches of your privacy as top priority, and the Investment Firm will enhance its internal procedures to prevent any such event.

The Investment Firm has implemented procedures in respect to safeguarding your data. Access to your information has only employees and/or Tied Agents that need to have access to the information in order to enable the continuity of the agreement between you and the Investment Firm.

Furthermore, we hold personal information in a combination of secure computer storage, secure servers and from time to time and if it is deemed necessary, we will store them in paper-based files. The Investment Firm has taken all the necessary steps to protect the personal information that it holds from misuse, loss, unauthorized access, modification or disclosure.

Examples of security measures we use:

- SSL technologies for cryptographic
- PCI scanning for active protection of our server
- Cryptographic protection of databases
- Antivirus software

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While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

12. Right of Access

You have the right to be provided a copy of the personal information we have about you, as well as information about how we use your personal information. In most cases, your personal information will be provided electronically. However, the way, how the right to access shall be fulfilled depends on the nature of personal data, the medium on which it is stored and with regards to the data protection of other subjects. If you require additional copies, we may charge you a reasonable administration fee.

To make a request, please contact us, verifying your identity and specifying what information you require. You may contact us via e-mail at dataprotection@wonderinterest.com.

13. Right to Erasure and Right to Obtain the Rectification of Inaccurate Personal Data

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. You may inform the Investment Firm at any time that your Information has changed, or that you wish the Investment Firm to delete information we hold about you or to rectify it, by emailing us at dataprotection@wonderinterest.com. We will change, rectify or delete your Information in accordance to your instructions, except to the extent that we are required to hold your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

14. Right to restrict processing

Under certain conditions stipulated by the applicable legislation you have the right to request that the Investment Firm restrict the processing of your personal data.

15. Right to data portability

You have the right to request that the Investment Firm transfer the data that we have collected to another organization, or directly to you, under certain conditions.

16. Right to object to processing

You have the right to object the processing of your personal data at any time on grounds relating to your situation.

17. The Right to notify the Data Protection Authority (DPA)

If you believe that we are processing your personal data unfairly or unlawfully, you may file a complaint with the supervisory authority: Office of the Commissioner for Personal Data Protection, Iasonos 1, 1082 Nicosia, Cyprus, +357 22818456, commissionerdataprotection.gov.cy.

18. Automated decision-making and profiling

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Generally, we do not make decisions about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you However, if we do so, you have the right to be informed on it and you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us.

19. Questions

If you have any questions regarding this Data Protection Policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at dataprotection@wonderinterest.com.

Furthermore, in case you are not happy with the quality of Services we have provided you with in regard to the personal data processing, you as a natural person have the right to lodge a complaint with our supervisory authority which is the Commissioner for Personal Data Protection in the Republic of Cyprus.

20. Update of this Data Protection Policy

This Data Protection Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.

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