

# PRIVACY POLICY

This privacy notice ("**Privacy Notice**") applies to all personal information processing activities carried out by Evalect Digital UAB ("**Evalect Digital**" or the "**Firm**").

Evalect Digital is a data controller with regards to the personal data that we process in the course of carrying out our business (including the products and services that we provide). Evalect Digital is committed to protecting your privacy and complying with your choices, and processes data in accordance with its responsibilities under the General Data Protection Regulations 2016/679 ("**GDPR**"). Both personal and non-personal information collected is safeguarded according to the privacy and data protection standards adopted worldwide.

This Privacy Notice outlines how we collect and use personal data in the course of carrying out our business, including providing services to, conducting business with counterparties that relates to the counterparty's employees, officers or other associated individual. "Personal data" is any information relating to an identified or identifiable living person.

We may update this Privacy Notice from time to time. When we do, we will communicate any material changes to you and make the updated Privacy Notice available.

## Data Evalect Digital Processes

Evalect Digital collects, handles, stores, discloses, and otherwise uses ("**process**") various categories of personal data at the inception, and for the duration, of your relationship with us. We will limit the collection and use of your personal data to that which is necessary for carrying out one or more legitimate purposes, as outlined in this notice. Personal data typically includes:

- Basic personal information, including name, address, and date of birth;
- Financial information, including occupation, bank account numbers, bank statement, financial assets, liabilities and trading information;
- Contact information, including email address and telephone number;
- Contract notes;
- Records of our discussions, including records of phone and video calls on messaging apps, such as Slack and Telegram ;

We do not normally process special categories of personal data. Any processing of special categories of personal data will only take place once we've obtained your explicit consent, or are otherwise lawfully permitted to do so. Special categories of personal data include:-

- Information about racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Physical or psychological health details or medical conditions; and
- Biometric information, relating to the physical, physiological or behavioural characteristics of a person.

Where permitted by law, Evalect Digital may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with law relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions.

# PRIVACY POLICY

## Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser. Learn more about cookies: [All About Cookies](#).

We use both session and persistent Cookies for the purposes set out below:

- **Essential Session Cookies – Administered by: Us; Purpose:** These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- **Notice Acceptance Cookies – Administered by: Us; Purpose:** These Cookies identify if users have accepted the use of cookies on the Website.
- **Functionality Cookies – Administered by: Us; Purpose:** These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.
- **Tracking and Performance Cookies – Administered by: Third-Parties; Purpose:** These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new advertisements, pages, features or new functionality of the Website to see how our users react to them.

## How we Obtain Data

Your data is made up of all the personal data we collect and hold about you. It includes:-

- Data you give to us
- Data that we receive from third parties
- Data that we gather from publicly available sources, such as company websites and online search engines.

## How we use your Data

We use this information for carefully considered purposes which also benefit our customers and which include but are not restricted to the following:

- to provide and facilitate our services and products
- to communicate with you

**Evalect Digital UAB**, Eišiškių sodų 18-oji g. 11, Vilnius, Lithuania.  
support@evalectdigital.com | evalectdigital.com | Registered in Lithuania, Company No: 305970229

# PRIVACY POLICY

- to occasionally send company news, updates, promotions, offers and information relating to products and services provided by Evalect Digital or of other parties that may be of interest to you
- to provide support for our services and products
- to create a “lookalike audience” or “matched audience” of (prospective) customers for targeted advertising on social media platform.
- to analyze website usage, analyze use of this website, analyze and measure ad impressions, and to protect the interests, rights, safety, or property of Evalect Digital or others and to monitor compliance with and enforce the terms of any agreement with Evalect Digital.
- to monitor to detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity, and hold those responsible for that activity

If you want to opt out of receiving promotional and marketing emails, text messages, posts and other forms of communication from us (or our promotional partners), which you might receive in accordance with this section, you can always click “unsubscribe” at the bottom of an email we sent you.

## Your Rights

### 1. Access

You have a right to get access to the personal data we hold about you. Please submit a request at [support@evalectdigital.com](mailto:support@evalectdigital.com)

### 2. Rectification

If you believe any of the data we hold about you is inaccurate, you have the right to request that we limit the use of that data and to rectify the inaccurate personal data.

### 3. Erasure

You have a right to request the deletion or removal of your personal data, and subject to the relevant law or regulation, we have to comply with that request in the following circumstances:

- We no longer need to use your personal data for the purposes for which it was originally collected;
- We have requested your consent to use your personal data and you wish you withdraw that consent; or
- We are not using your information in a lawful manner.

### 4. Restriction

You may request us to restrict the use of your personal data if you believe that:

- Any of the data we hold about you is inaccurate;
- We no longer need to use your data for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or
- We are not using your data in a lawful manner.

# PRIVACY POLICY

## 5. Portability

Where we have requested your consent to use your personal data or you have provided us with data for the purposes of entering into a contract with us, you have a right to receive the personal data you provided to us in a portable format. You may also request us to provide it directly to a third party, if technically feasible. We're not responsible for any such third party's use of your personal data, which will be governed by their agreement with you and any privacy statement they provide to you.

## 6. Objection

In certain circumstances, you have a right to object to the processing of your personal data, and to request us to the limit use, unless we can evidence compelling and legitimate grounds for the use, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims.

## 7. Withdrawal of Consent

Where we rely on your consent to process your personal data, you have a right to withdraw that consent at any time. We will always make it clear where we require your consent to carry out specific uses of your personal data. Please note that there may be legal, regulatory or other reasons why we would need to keep using your personal data, and Evalect Digital will inform you of those reasons if applicable.

## 8. Submit Complaints

If you wish to make a complaint regarding the way in which we have used your personal data, you can contact our Compliance department at [support@evalectdigital.com](mailto:support@evalectdigital.com), who will investigate this matter. While we hope that we can address any concerns you may have, you can also contact the Information Commissioner's Office (ICO). For more information, please visit [ico.org.uk](http://ico.org.uk).

Should you wish to exercise any of these rights, have any questions about how we use your personal data, or would like to make a complaint, please contact us at [support@evalectdigital.com](mailto:support@evalectdigital.com). Please note that in some circumstances, if you do not agree to the way we use your data, we may no longer be able to provide certain products and/or services to you.

## Sharing Data with Third Parties

Evalect Digital may share your personal data in the following ways:

- To other entities within the Evalect Digital group;
- To professional advisers such as accountants, auditors and law firms;
- Where we are required by law, and by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
- To selected third party providers providing services to us, such as anti-money laundering screening, onboarding due diligence or transaction monitoring services; and/or
- To select third party contractors or service providers that may process your Personal Data for us, such as marketing agencies, event co-sponsors, etc.
- Where it is permitted by law, it is necessary for our legitimate interest, or those of a third party, and is not inconsistent with the purposes listed above.

# PRIVACY POLICY

## Transferring Information Overseas

Evalect Digital may transfer your data to organisations in other countries outside of the UK and/or European Economic Area (“EEA”) on the basis that anyone to whom we pass it protects it in the same way we would in accordance with applicable laws.

Evalect Digital may also store your personal data via third party web-based applications, cloud services, or web-based storage providers, some of whom may be based outside of the EEA.

In the event if your personal data is sent outside the UK and/or EEA, and such transfer is not necessary for the performance of a contract or in relation to a legal or regulatory process, Evalect Digital will ensure that at least one of the following is in place:

- The UK or European Commission has decided that the country or the organisation we are sharing your information with will protect your information adequately;
- The transfer has been authorised by the Information Commissioner’s Office;
- We have entered into a contract with the organisation with which we are sharing your data to ensure your information is adequately protected;
- The transfer is required for us to meet our contractual or pre-contractual obligations with you;
- The transfer is needed to complete a contract with a third party in your interest;
- A matter of important public interest;
- The transfer is necessary for the establishment, exercise or defence of legal claims;
- We are protecting your vital interests; and/or
- You provide your explicit consent to the proposed transfer, after having been informed of the possible risks of such transfers due to the absence of adequate safeguards.

## Retention of Information

In the course of our relationship with you, we will create and store records of your personal data on a variety of media (physical or electronic) and formats. We maintain these records in order to carry out our business effectively and to comply with legal and regulatory requirements. Retention periods for these records are determined based on the type of records and the applicable legal or regulatory requirements.

Evalect Digital usually will keep your data for up to six years, following the termination of all agreements between Evalect Digital and the counterparty, unless one of the following reasons apply:

- We are required to retain the data for a longer period of time in order to comply with a legal or regulatory obligation;
- We are unable, or it is impractical, for technical or operational reasons, to delete the data. This exception generally applies to circumstances where the data has been written to offline storage such as back-up tapes. In such circumstances, it is impractical to delete relevant sections within these tapes, and to rewrite these tapes with the remaining data intact. Therefore, Evalect Digital reserves the right to retain such back-up tapes indefinitely.

## Changes to this Policy

If we make changes to our Privacy Policy, we will post these changes here so that you are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it. If at any point we decide to use your information in a manner different from that stated at the time it was collected, we will notify you by email.

## PRIVACY POLICY

### Questions or Comments

If you have questions or comments about this Privacy Notice, your rights to access your personal data, or if you have any concerns as to how your data is processed, please email us at [support@evalectdigital.com](mailto:support@evalectdigital.com)