

Privacy policy

This Privacy Policy is designed to address regulatory requirements of the jurisdictions in which CASPINEX offers its services, including the General Data Protection Regulation as enacted by the European Commission. In this Privacy Policy, the term “service” and “services” has the same meaning as described in the User Agreement. If you do not agree with this Privacy Policy, in general, or any part of it, you should not use the services. This Privacy Policy is periodically reviewed to ensure that any new obligations and changes to our business model are taken into consideration. We may amend this Privacy Policy at any time by posting an amended version on our website.

1. How We Use Your Personal Data

1.1 We may process data about your use of our website and services . The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our website. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is your consent OR our legal and regulatory obligations as a financial services provider.

1.2 We may process your account data . The account data may include your name, address, date of birth, phone number and email address. You are the source of the account data. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you. The legal basis for this processing is your consent OR our legal and regulatory obligations as a financial services provider.

1.3 We may process information contained in any enquiry you submit to us regarding our services . The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is your consent OR our legal and regulatory obligations as a financial services provider.

1.4 We may process information relating to our customer relationships, including customer contact information . The customer relationship data may include your name, the name of your employer, your job title or role, your contact details, and information contained in communications between us and you. The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to

customers. The legal basis for this processing is your consent OR our legal and regulatory obligations as a financial services provider.

1.5 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website. The transaction data may include your contact details, your card details, your virtual wallet details and the transaction details. The transaction data may be processed for supplying our services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legal and regulatory obligations as a financial services provider.

1.6 We may process information that you provide to us for subscribing to our email notifications and/or newsletters . The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is your consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

1.7 We may process information contained in or relating to any communication that you send to us . The correspondence data may include the communication content and metadata associated with the communication. Our website and/or the relevant app will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users OR our legal and regulatory obligations as a financial services provider.

1.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

1.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

1.10 You will not supply any other person's personal data to us, unless we prompt you to do so.

2. Retaining and Deleting Personal Data

2.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

2.2 We will retain your personal data as follows:

(a) Account related personal data, including transaction data will be retained for a minimum period of 5 years following the closing of the account.

(b) Any other personal data will be retained for a minimum period of 5 years after the data was submitted to us.

2.3 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on our legal and regulatory obligations as a financial services provider.

3. Amendments

3.1 We may change the terms of this Privacy Policy at any time. Any such changes shall take effect when posted on the website, or when you use the services. If you disagree with any changes to this Privacy Policy, contact us.

3.2 Your continued use of the services shall signify your acceptance to be bound by the current Privacy Policy.

4. Your Rights

4.1 In this Section 4, we have summarized the rights that you have under the data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you

should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

4.2 Your principal rights under the data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority
- (h) the right to withdraw consent.

4.3 You have the right to confirmation as to whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing that the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, You can request your personal data by sending an email to CRM@caspinex.com.

5. Our Company Details

5.1 This website is owned and operated by CASPINEX Ltd.

5.2 We are a company registered in the United Kingdom.

5.3. You can contact us by email at crm@caspinex.com