

The logo for eyeFG features a stylized eye composed of concentric, glowing rings in shades of teal and yellow, with a central yellow sphere. The text "eyeFG" is positioned to the right of the eye graphic.

eyeFG

DATA PRIVACY POLICY

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1. INTRODUCTION

This Data Privacy Policy (the “**Policy**”) explains what information **EyeFG Ltd** (hereinafter the “**Provider**”, “**we**”, “**us**” or “**our**”) collects, how we use and safeguard that information and with whom we may share it. When you use our services, we process personal data about you as our customer or user (“**you**”, “**your**” or the “**Client**”).

This Policy provides you with information about:

- what personal data we collect;
- how and why we process it;
- how long we keep it;
- with whom we may share it; and
- what rights you have and how to exercise them.

We are committed to protecting the security and privacy of your personal data and to conducting our business in compliance with applicable Cypriot laws on privacy, data protection and data security, in particular the Data Protection Act 2017 of the Republic of Cyprus (GDPR and Cyprus Law 125(I)/2018) and any regulations or guidelines issued by the Office of the Commissioner for Personal Data Protection.

For the purposes of this Policy, **personal data** means any information relating to an identified or identifiable individual. All information on the basis of which we can directly or indirectly identify you or which relates to you is considered personal data.

By registering on our website or otherwise using our services, you acknowledge that you have read this Policy. In some situations (for example, certain types of marketing or where the law requires it), we will also rely on your **consent** as a legal basis for processing; you may withdraw such consent at any time (see section 8).

2. CONTROLLER OF YOUR PERSONAL DATA AND CONTACT INFORMATION

The **controller** of your personal data is:

EyeFG Ltd

**A company registered in the Republic of Cyprus
(Company registration number: HE 481186)**

Registered Address:

Morfou 48, Egkomi, 2417 Nicosia - Cyprus

If you have any questions about this Policy or wish to exercise any of your rights, you can contact us at:

Email: info@eyefg.com

If we appoint a designated Office of the Commissioner for Personal Data Protection in accordance with the GDPR and Cyprus Law 125(I)/2018, we may provide additional contact details on our website.

3. INFORMATION COLLECTED AND HOW IT IS OBTAINED

Most of the personal data we process is obtained directly from you in connection with your use of our services. This includes:

3.1 Data you provide directly

You provide data to us, in particular when you:

- register on the website;
- create or update your user account;
- order or use our services;
- participate in our events, campaigns or projects;
- communicate with us through customer support, contact forms or social networks.

These data typically include:

- **Identification and contact data**
 - name,
 - surname,
 - telephone number,
 - email address,
 - postal address,
 - date of birth,
 - username and password.
- **Payment data**
 - bank details,
 - payment method details,
 - billing information.
- **Other data**
 - records of communication between you and our company (emails, chat logs, tickets),
 - details of any warranty or service claims in relation to our services.

3.2 Data we collect automatically when you use our services

When you access and use our website and services, we automatically collect certain information, such as:

- **Data about your device**
 - IP address,
 - device type,

- operating system,
- browser used,
- internet service provider.
- **Website usage data**
 - date, time and duration of your visit,
 - country and approximate location from which you visit,
 - pages visited and actions taken on the website.
- **Data on the use of the services**
 - login and logout information,
 - your account settings,
 - value and currency of any fictitious or simulated capital,
 - information about your business or trading strategy as used within our services.

We may use cookies and similar technologies to collect some of these data; further details may be provided in a separate **Cookies Policy** on our website.

3.3 Data from third parties

We also receive some data about you from third parties, such as:

- **Providers of trading platforms** that you choose to use in combination with our services;
- **Social network operators**, if you decide to link your social network accounts to your account on our website.

These may include:

- **Data about simulated transactions**
 - type of financial instrument,
 - time of opening and closing positions,
 - amount of investment,
 - profit and loss figures.
- **Data from social networks**
 - username,
 - profile picture,
 - email address associated with the social media account.

For information on how trading platform providers and social network operators process your personal data for their own purposes, please refer to their respective privacy policies.

4. HOW YOUR PERSONAL DATA IS USED

We only process your personal data where there is a lawful basis to do so under the GDPR and Cyprus Law 125(I)/2018. Lawful bases include: performance of a contract, compliance with a legal obligation, legitimate interests, the protection of vital

interests, performance of a task carried out in the public interest or in the exercise of official authority, and your consent.

Below we explain how we use your data and the main legal grounds we rely on.

4.1 Registration and user account

Purpose:

To allow you to register on our website, open and maintain a user account and use our services.

Personal data:

- identification and contact details;
- data related to your account settings and profile.

Legal ground for processing:

- **Performance of a contract / pre-contractual steps** – processing necessary for the creation and maintenance of your user account and the performance of the contract between you and us;
- **Legitimate interests** – to manage user accounts and ensure proper functioning of our services.

4.2 Provision of services and exercise of rights and obligations under the contract

Purpose:

To provide you with our services (including access to relevant tools, support and simulated trading functionalities) and to exercise and protect our contractual rights and obligations.

Personal data:

- identification and contact data;
- payment data (for paid services);
- data on your use of the services;
- data on simulated trades;
- data from social networks (if you choose to link those accounts).

Legal ground for processing:

- **Performance of a contract** – processing necessary to provide and manage the services you have requested;
- **Legitimate interests** – after the relationship ends, we may continue to process some data for a limited period to exercise and protect our legal rights (for example in case of disputes, chargebacks or claims).

4.3 Marketing communication about our services, products or events

Purpose:

- If you are an existing or past customer, we may from time to time send you marketing communications about our services or events we take part in, to the extent permitted by law.
- We may also send you commercial communications where you have explicitly given us your consent.

You can unsubscribe from marketing communications at any time by using the link included in each email or by contacting us.

Personal data:

- identification and contact data.

Legal ground for processing:

- **Legitimate interests** – where we have previously provided you with our services, to keep in touch and inform you about similar services;
- **Consent** – where you have given explicit consent for marketing; you may withdraw your consent at any time.

4.4 Customer support and communication

Purpose:

To provide customer support, handle queries, complaints and other communications.

Personal data:

- identification data;
- contact data;
- other data that you provide in your communication;
- data from social networks if you contact us through social media.

Legal ground for processing:

- **Legitimate interests** – to maintain customer satisfaction, support the use of our services and resolve issues;
- **Performance of a contract** – where communication is necessary to fulfil our obligations under the contract.

4.5 Improving services

Purpose:

To develop, test and enhance our services and improve their security and performance.

Personal data:

- identification and contact data;
- data about your device;
- website usage data;
- data on the use of the services;
- data on simulated trades.

Legal ground for processing:

- **Legitimate interests** – to improve our services, user experience and security.

4.6 Analytics

Purpose:

To analyse customer behaviour and obtain information about how our website and services are used, in order to understand trends, measure effectiveness and support business decision-making.

Personal data:

- identification and contact data;
- payment data;
- data about your device;
- website usage data;
- data on the use of the services;
- data on simulated trades.

Legal ground for processing:

- **Legitimate interests** – to understand customer behaviour and preferences, and to improve our products and services accordingly.

5. HOW PERSONAL DATA IS STORED AND SECURED

We process your personal data in secured systems (including encrypted databases) hosted on computers and other devices or in secure cloud environments. To protect against unauthorised access, alteration, disclosure or destruction of personal data,

we implement and maintain appropriate technical and organisational measures in line with the GDPR and Cyprus Law 125(I)/2018 and good industry practice.

These measures include, as appropriate:

- access controls and role-based authorisation;
- encryption and secure storage;
- network and application security;
- backup and recovery procedures;
- physical security for premises and equipment;
- incident detection and response procedures.

Access to personal data is restricted to employees and authorised service providers who need such access to perform their duties and are bound by confidentiality obligations.

While we use reasonable efforts to safeguard your information, you acknowledge that use of the internet is not entirely secure and we cannot guarantee the security or integrity of personal data transferred to or from you over the internet.

6. RETENTION PERIOD

We process personal data only for as long as is necessary to fulfil the purposes described above or for as long as is required under applicable Cypriot law and regulations (for example, tax and accounting rules or statutory limitation periods).

After the relevant retention period expires, personal data is either deleted or irreversibly anonymised.

In particular:

- **For performance of contracts and related rights/obligations**
We process personal data for the duration of the contractual relationship and for a period necessary to resolve complaints, claims or disputes, typically up to 10 years from the termination of the last contract, in line with typical limitation and record-keeping periods under Cypriot law.
- **For sending business communications without separate consent**
We process personal data for a maximum of **5 years** from the expiry of the last contract between us, or until you object or unsubscribe from business communications, whichever occurs first.
- **For the purpose of enhancing our services**
We usually process personal data for a maximum period of **6 months** for analytical and improvement purposes, after which the data is anonymised or aggregated where possible.
- **For compliance with legal obligations**
We process personal data for the period set out by relevant legal regulations (for example, under tax laws and AML-related obligations, which may require retention for several years after the relevant transaction or document date).

- **Where you have given consent**

We process personal data for the period specified in the consent, or until you withdraw your consent.

7. DATA SHARING AND TRANSFERS OUTSIDE CYPRUS

7.1 Data sharing with third parties

We may make your data available or transfer it to third parties that help us provide and support our services, including:

- providers of trading platforms, in order to enable you to perform simulated trades;
- hosting and cloud service providers;
- payment system operators and financial institutions;
- providers of customer support tools and services;
- IT companies and system administrators;
- marketing and communication agencies and consultants;
- professional advisers (such as lawyers, auditors, tax advisors);
- other service providers who support the operation of our website and services.

Each such third party is contractually obliged to:

- protect your personal data in accordance with applicable legal provisions; and
- process the data only on our documented instructions and for the specified purposes, unless they act as an independent controller for their own legal purposes.

Certain third parties (for example, payment providers or trading platform operators) may collect personal data for their own purposes as controllers. In such cases, their own privacy policies and data protection rules apply.

We may also disclose your personal data:

- where you have given us your explicit consent;
- where we are required to do so by law or by a court order or other legally binding decision;
- where necessary for the establishment, exercise or defence of legal claims.

7.2 Transfers of personal data outside Cyprus

In some cases, we may transfer your personal data to countries outside the Republic of Cyprus (for example, where our service providers host data or operate support services abroad, or where trading infrastructure is located overseas).

Any such transfers will be carried out in accordance with section 36 of the Data Protection Act 2017, which regulates the transfer of personal data outside Cyprus.

We will ensure that:

- transfers are made to countries, organisations or systems that provide an appropriate level of protection for personal data; or
- we implement suitable safeguards (such as contractual clauses, binding arrangements or technical measures) approved or accepted under Cypriot law; or
- another condition under the GDPR and Cyprus Law 125(I)/2018 is satisfied (for example your explicit consent, performance of a contract, important public interest, or the establishment, exercise or defence of legal claims).

If you would like more information about transfers of your personal data outside Cyprus, you may contact us using the contact details in section 2.

8. YOUR RIGHTS UNDER CYPRIOT LAW

Under **Part VII of the Data Protection Act 2017**, you have several rights in relation to your personal data, subject to certain conditions and lawful limitations.

You may exercise these rights at any time by sending a request to info@eyefg.com. Please provide sufficient information to identify yourself and specify which right you wish to exercise and what action you are requesting.

8.1 Right of access

You have the right to obtain from us confirmation as to whether or not we process personal data concerning you and, if we do, to access such data and certain information about the processing.

We may refuse to provide information if regulatory or legal obligations prevent us from doing so. Where your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request.

8.2 Right to rectification

You have the right to request without undue delay the rectification of inaccurate personal data concerning you and to have incomplete data completed.

If you have registered on our website, you may be able to rectify and amend some of your personal data yourself by editing your user account.

8.3 Right to erasure (“right to be forgotten”)

You have the right to obtain the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent (where consent was the legal basis) and there is no other legal ground for processing;
- you object to processing and there are no overriding legitimate grounds for the processing;
- your personal data have been processed unlawfully;
- erasure is required for compliance with a legal obligation.

We may not be able to act on a request for erasure where processing is still necessary, for example:

- for compliance with our legal obligations (including record-keeping under tax, AML or financial regulations);
- for the performance of a task carried out in the public interest;
- for the establishment, exercise or defence of legal claims;
- for other reasons provided by applicable law.

8.4 Right to restriction of processing

You have the right to obtain restriction of processing of your personal data, for example where:

- you contest the accuracy of the personal data, for a period enabling us to verify the accuracy;
- the processing is unlawful and you request restriction instead of erasure;
- we no longer need the data for the purposes of processing, but you require them for legal claims;
- you have objected to processing and we are assessing whether our legitimate grounds override your interests.

Where processing is restricted, we will only process the data (apart from storage) with your consent or for legal claims, protection of another person's rights or important public interest.

8.5 Right to object

Where we process your personal data on the basis of our **legitimate interests** or for the performance of a task carried out in the **public interest**, you have the right to object at any time, on grounds relating to your particular situation.

If you object, we will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or where processing is required for the establishment, exercise or defence of legal claims.

If we process your personal data for **direct marketing purposes**, you have the right to object at any time to such processing, including profiling related to direct marketing. In that case, we will stop processing your personal data for marketing purposes without undue delay.

8.6 Right not to be subject to decisions based solely on automated processing

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you, except where this is permitted under the GDPR and Cyprus Law 125(I)/2018 and subject to appropriate safeguards.

8.7 Right to withdraw consent

Where processing is based on your **consent**, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal, nor does it affect processing based on other legal grounds.

However, if certain services depend on processing that was based on your consent, we may no longer be able to provide those services once you withdraw consent. We will inform you where this is the case.

8.8 Right to lodge a complaint

If you believe that we are processing your personal data in violation of applicable legal provisions, you have the right to lodge a complaint with the Commissioner for Personal Data Protection of Cyprus:

Office of the Commissioner for Personal Data Protection
Iasonos 1, 1082 Nicosia – Cyprus

Tel: +357 22818456 email: commissioner@dataprotection.gov.cy

We would, however, appreciate the opportunity to address your concerns before you approach the Commissioner, so please consider contacting us first.

9. FINAL PROVISIONS

We may amend or update this Policy from time to time, for example due to changes in our services, internal processes, or applicable law and regulatory guidance.

We will only make unilateral changes where necessary and proportionate, and we will notify you of material changes through appropriate means (for example by email, in your client section or via a notice on our website). The latest version of this Policy will

always be available in your Client Section or on our website, and the current version will supersede and replace all previous versions as of its effective date.