

Privacy Policy

This Privacy Policy applies for the website **instamax.io** managed by INSTAMAX ADVISORY LTD with registration number HE449261 and having its registered address at Foivis 5A, 3116, Limassol, Cyprus (referred to as the “Company”). By using the website, the user confirms to understand, accept and agree with all of the provisions of this Privacy Policy. This Policy may be modified or supplemented at any time without prior notice or warning. By using the website under a modified Policy, the user confirms to agree with the realised modifications.

CONTROLLER

INSTAMAX ADVISORY LTD is the controller and is responsible for your personal data in accordance with the applicable data protection laws, including, without limitation, the Cyprus Data Protection Law 125(I)2018, and the EU General Data Protection Regulation (GDPR).

The supervisory authority responsible for us is:

Name of the supervisory authority: Cyprus Commissioner for Personal Data
Protection Address: P.O.Box 23378, 1682 Nicosia, Cyprus Email:
commissioner@dataprotection.gov.cy

PERSONAL DATA COLLECTED

The Company may collect the following categories of Personal Data:

Voluntary contents and information provided by the User/Client:

- Contact information: Personal Data that the User voluntarily provides to the Company, upon establishing a business relationship with us such as personal details (Full name, identification number, residential address etc). If the User does not communicate Personal Data, for which there is a legal or contractual obligation, will be impossible for the Company to provide, in whole or in part, its services. It will be impossible also in the case that Personal Data is a necessary requirement for the use of the service or for the contract conclusion.

The User who communicates to the Data Controller third parties Personal Data, is directly and exclusively liable for their origin, collection, processing, communication or disclosure.

Data and contents automatically acquired when visiting the website:

- Technical Data: the computer system and the software procedures functional to the website may acquire, in the course of their ordinary activity, any Personal Data whose communication is implicit in the use of internet communication protocols. Such information is not collected to be associated with identified Users, however, those Data, due to its nature, may identify Users in the Processing and through the association with Data held by third parties. This category includes IP addresses or domain names used by Users, addresses of Uniform Resource Identifier (URI) of the requested resources, time of the request, method used to submit the request to the server, size of the file obtained, etc.

Personal Data collected through cookies or similar technologies.

- The Company uses cookies, web beacons, unique identifiers and any other similar technologies to collect Data regarding pages, visited links and other actions, which you may perform while visiting our website. They are stored for being communicated back to the same websites at the next visit of the User. The User may read the complete Cookie Policy found in our website.

PURPOSES OF PROCESSING

Collected Personal Data may be used for the performance of contractual and precontractual obligations and legal obligations.

PERSONAL DATA PROCESSING METHODS

The Processing of Personal Data is performed with paper, IT and/or digital tools, with methods of organizations and with logics strictly related to the indicated purposes. In certain cases, subjects other than the Data Controller who are involved in the organization of the Data Controller (such as

personnel management, sales personnel, system administrators' employees, etc.) or who are not (as IT companies, service providers, postal couriers, hosting providers, etc.) may access to Personal Data. These subjects will be appointed, where necessary, as Data Processors by the Data Controller and will have access to Users Personal Data whenever required and shall be contractually obliged to keep it confidential. The updated list of Data Processors may be requested via email at the email address instamax-cy@outlook.com.

LEGAL BASIS FOR THE PROCESSING

The Data Controller processes Personal Data regarding the User under the following conditions:

- The User has given consent for one or more specific purposes.
- It is always possible to ask the Data Controller to clarify the concrete legal basis of each processing.

PLACE

Personal Data are processed in the operative offices of the Data Controller and in any other place in which the parties involved in the Data processing are located. For further information, you may contact the Data Controller at the following email instamax-cy@outlook.com.

TRASNFERS TO THIRD COUNTRIES

Personal Data may be transferred to Countries outside the EU. With respect to these Countries, an adequacy decision by the European Commission exists or, in the absence of such decision, it is possible to request further information to the Data Controller regarding any adopted appropriate safeguards as well as the means to obtain a copy of Data or the exact location where they have been stored.

SECURITY OF PROCESSING

The Data Processing is performed through adequate methods and tools to ensure the Personal Data security and confidentiality, as the Data Controller has implemented appropriate technical and organizational measures which guarantee, in a provable way, that the Processing complies with the Applicable Laws and/or Regulations.

PERIOD OF DATA STORAGE

- The Data Controller will store Personal Data for the necessary time to perform the purposes connected with the performance of the agreement in force between the Data Controller and the User and Data shall not be stored beyond the duration of years 5 after the end of the relationship with the User. In any case Data could be stored within the limitation term prescribed by the current regulations.
- When the Processing of Personal Data is necessary for the purposes of the legitimate interests pursued by the Data Controller, Personal Data shall be stored until the performance of the relevant interest.
- When the Processing of Personal Data is based on the User consent, the Data Controller may store Personal Data until the withdrawal of the User.
- Personal Data may be stored for a longer period of time in order to perform a legal obligation or public Authority order.
- All Personal Data shall be deleted at the end of the period of storage. At the expiration of such a period, the rights of Data access, rectification, erasure and portability must not be exercised.

RIGHTS OF THE USER

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a

structured, commonly used, machine -readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please Contact us to the following email: instamax-cy@outlook.com.

In your email, please explain in detail your request. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

AMENDMENTS TO THE POLICY

This Privacy Policy may be revised, modified, updated and/or supplemented at any time, without prior notice, at the sole discretion of the Company. When we make changes to this Privacy Policy, we will notify all users on our website, and make the amended Privacy Policy available on our website. We encourage you to review this Privacy Policy from time to time to stay informed. For significant material changes in the Policy or, where required by the applicable Laws, we may seek your consent.

INFORMATION, COMPLAINTS AND CONTACT



If you have any further questions regarding the data the Company collects, or how we use it, then please feel free to contact us by email at: instamax-cy@outlook.com.

You have a right to lodge a complaint with supervisory authority, to enforce your rights, as specified above. You can find out how to do this at the <https://www.dataprotection.gov.cy/>.