

# Privacy Policy

## 1. Obligations of the company

1.1. Summerhill CO (the Company) places a high priority on the privacy and integrity of the personal information of our Clients, both present and future and other visitors to the site. The Company strives to ensure the safety and confidentiality of all information received from the Client. This Privacy Policy (the Policy) describes how the Company collects, uses and protects the personal information of the Client. This Policy does not require you to submit any more information than you have already provided to the company if you are our client, and in the case of changes to the service by authorized representatives of the company.

## 2. The Client's Personal Data

2.1. To open an account, the Company will need certain information (Personal Data) about the Client. This data will also provide you with a better understanding of your needs and will help us provide you with information about products and services that are most suitable and convenient for you. This data will also be used to improve the quality of advising our Clients on all emerging issues.

## 3. The Personal Data received from the Client

3.1. Information provided on applications and other Company forms, such as name, address, date of birth, passport data, occupation and personal mobile phone number.

3.2. Financial information such as income, assets, investment experience.

3.3. Documents provided to confirm identity, such as passport, utility bills, and/or bank statements or company incorporation information.

3.4. Payment documents: money transfer orders, bank statements, bank card copies, etc.

## 4. Use of Personal Data

4.1. The Company may use a Client's Personal Data for one or more of the following purposes:

- a) to confirm the Client's identity;
- b) to process trading and non-trading operations;
- c) carry out the company's anti-money laundering policy;
- d) to inform the Client of Company products or services that may be of interest to the Client; e) to provide other services that are relevant to the Client's business relationship with the Company; f) to keep a correct database of the Client's account data;
- g) to analyze statistical data to provide Clients with the most suitable products and services.

## 5. Cookies

5.1. Cookies are small text files sent by a web server and stored on a visitor's browser which are read later by the server when the visitor returns to the site. Cookies store information such as passwords (encrypted), usernames, shopping cart, certain preferences, etc. allowing visitors to visit sites repeatedly without having to enter the same information over and over. Cookies are not used to determine the personal identity of anyone visiting the site.

## 6. Third Parties

6.1. The Company may convey the Client's Personal Data to associated or affiliated companies, auditors, agents (including payment agents), banks or other authorized organizations or persons (Authorized Persons) for the sole purpose of processing the Client's trading and non-trading instructions.

The Company guarantees that all Authorized Persons will adhere to the terms of this Policy and take all necessary steps to protect the Client's Personal Data. The Company may provide Personal Data to third parties who are not the Company's partners, agents or affiliates only when requested by representatives of legal or administrative authorities.

## **7. Use of Information**

7.1. By registering an account with the Company, you consent to the use of your personal details, and their processing: collection, recording, classification, aggregation, storage (updating, changing) extraction, use, transfer (distribution, provision of access) anonymization, blocking, deletion, and destruction of any information relating directly or indirectly to you, your trade transactions and payments, in accordance with this Privacy Policy.

## **8. Security and Protection**

8.1. The Company takes the issue of security very seriously and takes all possible measures to ensure the safety of your confidential information, including adhering to strict standards for the internal use of confidential information and using leading data storage technology.

8.2. The company uses the Transport Layer Security (TLS) cryptographic protocol version 1.2. for the protection of Customer information.

8.3. To make a payment from a plastic card, you fill out the form on the website of the processing center. To exclude the possibility of using these data, they are transferred to the Company in a reduced version (PSI / DSS standard) via a secure connection (see 8.2.). The company does not store full information about bank cards of customers.

## **9. Contacts**

9.1. If you have any questions about this Policy do not hesitate to contact us:

compliance@summerhill.support

Summerhill CO