

PRIVACY STATEMENT
(version 26 Februari 2020)

1. INTRODUCTION

- 1.1 Finodex B.V. – here after “Finodex” - respects your privacy. We value the trust you place in us and make every effort to protect your privacy. With this privacy statement we want to make clear why we collect certain information and how we protect your privacy.
- 1.2 ‘We’ refers to: Finodex B.V., established at Huizermaatweg 570, 1276 LN Huizen, the Netherlands, registered at the Chamber of Commerce under number 32095473, tel: +31 (0)85 1050 530; email: info@Finodex.com.
- 1.3 Finodex is "controller" for the processing of personal data on finodex.com. The controller is the person who determines the purpose and means for processing personal data. Personal data is data that can be traced directly or indirectly to a person. You are entitled to a careful handling of your personal data, in accordance with the General Data Protection Regulation. Finodex has high requirements to guarantee your privacy. With this privacy statement, Finodex aims to inform users about how Finodex processes personal data.

2. HOW WE RECEIVE YOUR DATA

- 2.1 When using our services you provide data to Finodex. This can be personal data.

3. PURPOSE AND GROUND OF PROCESSING

- 3.1 Finodex processes personal data so that we can identify you and you can use our services. These processes are therefore necessary to execute the agreement with you.
- 3.2 For example, we use your personal data to be able to make connections with signal providers and brokers of your choice, to be able to settle payment transactions and to maintain our relationship with you.
- 3.3 Depending on the situation, we process personal data on the basis of the following principles: necessary for the performance of an agreement, performance of a legal obligation (for example, tax retention obligations) and legitimate interests of Finodex (for example, the importance of maintaining a relationship with you). In some cases we will need your permission.

4. PERSONAL DATA

- 4.1 Finodex processes the following personal data:
- a) First and last name;
 - b) gender;
 - c) email address and possibly post/invoice address;
 - d) date of birth;
 - e) the investment systems and signals that you follow;
 - f) your purchase and sales orders;
 - g) your trading account number (broker account name).

5. YOUR RIGHTS

- 5.1 You can make specific requests to Finodex to exercise your rights through the contact details specified in Article 1.2. You have the right to request Finodex to inspect, correct, delete and block your personal data or to object to the processing. In addition, you are entitled to data portability under certain circumstances. You also have the right to submit a complaint to the Dutch Data Protection Authority.
- 5.2 You have the right to withdraw your consent for the processing of personal data at any time. This does not affect the legality of the consent-based processing that took place before this withdrawal. Withdrawal of your consent may result in Finodex being unable to provide certain services.

6. RECIPIENTS

- 6.1 Unless you give separate permission for this, Finodex will not provide and / or sell your personal data to third parties. We do, however, provide your personal data to your brokers and signal providers, insofar as this is necessary for the performance of our services. Our IT service providers, for example IT support companies or software tools for customer communication, can also gain access to your personal data if necessary.
- 6.2 The personal data that you provide to Finodex is not searchable for search engines.

7. SECURITY AND RETENTION TERMS

- 7.1 Finodex has taken appropriate technical and organizational measures to protect your personal data against loss or any form of unlawful processing.
- 7.2 Finodex will not store your personal data for longer than necessary for the purposes for which it was collected. In certain cases, we may retain the personal data for longer, for example for securing evidence or complying with legal retention obligations.

8. CHANGES

- 8.1 Finodex can change this privacy statement. Users will be notified prior to any substantive changes to this privacy statement and, if necessary, will be asked for their consent for certain data processing operations.