

Privacy Policy

Aivisor LTD

October, 2021

This Privacy Policy applies to the information (including personal data) that you provide to Aivisor LTD when using the Finrooms trading platform through the site finrooms.com and/or the Finrooms mobile application (hereinafter the Trading Platform). All further references to the site finrooms.com and the Finrooms mobile application are equivalent.

This Privacy Policy is an integral part of the Client Agreement.

The information you provide is jointly collected and processed by Aivisor LTD, registered in accordance with the laws of St. Vincent and the Grenadines, located at Suite 305, Griffith Corporate Centre, Kingstown (hereinafter - the Company), providing access to the Trading Platform.

We assure you that we take all measures necessary to ensure the confidentiality of the personal data that you provide to the Companies.

We encourage you to carefully read this Privacy Policy. By registering on the site finrooms.com, you fully and unconditionally agree to its terms.

1. The information you provide to us

1.1. Like most websites, we use cookies.

Some cookies are necessary for the normal operation of the site finrooms.com and are used without obtaining your additional permission. These files include the following:

1. cookies needed to identify the source from which the transition was made to the website finrooms.com;
2. cookies containing the user session ID on finrooms.com.

We also collect and process data about your device, including the IP address (Internet Protocol address) and browser configuration.

1.2. When registering on the site finrooms.com, we ask you to provide your email address. In the future, you have the option to enter your first and last name, date of birth, gender, phone number and country in your personal account on the site.

1.3. When crediting an account on the Trading Platform, our partners (financial institutions and payment system providers) receive and process information containing your payment details, including the bank card number, its expiration and CVC/CVV code, information on the credit/financial institution and/or the issuer, and other data depending on the means of payment, as well as your first and last name. Also, upon the request of the payment system or payment system provider, we may provide them with data from your passport or other identity document, email address, and phone number (in the event this data is indicated in your personal account).

Payment system providers process such information during the period of your use of the Company's services and delete it upon achieving the processing goals, unless the law requires or allows for the establishing of a longer period for the storing of such personal data.

A prerequisite for our cooperation with payment system providers is that they fulfill the requirements of the General Data Privacy Regulation (GDPR).

1.4. During verification, we request from you a copy of the two pages of your passport with the photo and personal data or a copy of the front and back side of an ID card, as well as your payment details. In some cases, we may request current utility bills, the agreement with the bank to open the account, scanned copies of bank cards, or other documents, if the information you previously provided does not enable us to fully verify your identity.

1.5. We collect and store data on your financial activity and other actions on the Trading Platform, as well as information contained in web server reports (including the interface language, browser type, and date and time of the last visit).

1.6. From time to time, we may ask you to fill out questionnaires in order to improve the quality of service, for statistical purposes, or to comply with applicable laws.

Sometimes when filling out a form you will be asked to provide your name and email address.

1.7. When contacting the Company's support service, we ask you to include your first and last name, email address, as well as information about the dispute (if there is a dispute).

1.8. In order to comply with international legislation on countering the laundering of proceeds from crime (Anti-Money Laundering, AML), and adhering to the principle of "Know Your Customer," KYC, we are entitled to ask you for other information and data, the list of which is established by relevant laws, including information about the sources of your income.

Please note that in most cases, if you do not provide the necessary information, we cannot provide you with the service you have requested.

2. Legal grounds

We collect and process your personal data only in the following situations:

1. it is necessary in order to conclude the agreement on the provision of services (Client Agreement) in accordance with your request and its further execution;
2. you have given us your consent to the collection and processing of such data, including through the acceptance of the terms of the Client Agreement and the Privacy Policy when registering on finrooms.com;
3. such collection and processing is necessary in order to comply with the requirements of applicable law;
4. such collection and processing is due to our legal interests, while we always strive to maintain a balance between our legal interests and the confidentiality of your personal data.

3. How we use the information you provide

3.1. The information we receive about you allows us to provide quality services, develop our existing services, and create new ones.

3.2. Your data obtained using cookies and similar tools ensures the functionality of the site finrooms.com and improves the quality of the services provided.

3.3. The data collected when visiting the site finrooms.com is necessary for the operation of the Trading Platform and its subsequent analysis, as well as to provide you with information in the most convenient way for you.

For example, such data makes it possible to determine the language of the Trading Platform user interface and the account currency.

3.4. The data provided during registration and verification (including last name, first name, middle name (if any), gender, date of birth, nationality, and email address) is used to contact you and to provide you with the most accurate and personalized information.

Moreover, the data obtained by us during verification is necessary to ensure the legality and security of the Company's services.

3.5. Information about your financial activity and other activity on the Trading Platform, as well as information from web server reports, is used to protect your funds and block scammers from accessing your account.

3.6. We may use the information you provide, including your name, email address, and phone number, in order to send you system notifications and advertising materials via phone calls, text messages, and other methods not prohibited by applicable law.

You have the right to unsubscribe from the Company's mailing list and calls at any time by clicking on the "Unsubscribe" link in an email from the Company, turning off the corresponding option in your personal account on finrooms.com, or contacting the Company's support service. We are committed to promptly responding to your request to unsubscribe from all types of emails (except for transactional notifications), as well as not to receive calls and text messages.

3.7. From time to time, we may send notifications about changes in the operation of the site finrooms.com or the terms of service provision to your email address.

3.8. Moreover, we need your data in order to personalize the content of the site finrooms.com and show you relevant advertising.

3.9. The data you provide when contacting the Company is necessary in order to establish the circumstances of your appeal and provide a complete answer in the shortest possible time.

In the event we need to use the information provided for other purposes, we always ask for your consent.

In the event of automated processing of personal data, we ensure that such processing does not have any impact on you.

4. How long we store your data

We store your personal data during the entire period of validity of our Client Agreement and delete it upon achieving the processing goals.

In some cases, the law requires us to store personal client data for a longer time. This means that sometimes we will store your personal data even after the termination of the Client Agreement. Such cases, in particular, include the investigation of fraud (including potential fraud), as well as the prevention of the legalization of funds obtained by criminal means and the financing of terrorism.

5. Your rights

Regarding the information you provide, you have the right to the following:

1. to request a complete list of your personal data processed by the Companies;

2. in the event that inaccuracies and errors are detected in such data, to initiate a procedure to make corrections and clarifications regarding them;
3. to request a copy of the electronic file containing your personal data processed by the Companies;
4. to demand that we suspend the processing of your personal data;
5. to demand that we delete your personal data or stop processing it.

This list of rights is not complete and may include other rights established by applicable law.

Please note that your right to demand that we suspend or terminate the processing of your personal data and/or delete it is not absolute and may be limited by applicable law, including (but not limited to) the requirements of AML & KYC legislation.

In addition, in some cases exercising this right may serve as the basis for the termination of the provision of services to you in connection with restrictions established by applicable law.

6. Personal data deletion

If you would like to have your personal data deleted, please contact us at support@finrooms.com. If your request does not come into conflict with any applicable laws and regulations it will be fulfilled within 24 hours of receipt. Otherwise, you will be contacted via email to discuss alternatives.

7. The information we provide to third parties

We do not share your personal data with third parties who are not affiliated with your activity on the website finrooms.com.

The persons to whom we may transfer your personal data process it on our behalf and strictly in accordance with our requirements, instructions, and Privacy Policy.

Such persons may include the following:

1. a limited number of employees of the Companies and employees of persons affiliated with the Companies;
2. professional auditors;
3. professional dispute resolution organizations;

4. payment systems;
5. payment system providers;
6. service providers that significantly affect the performance and operation of the Trading Platform.

For promotional purposes, as well as for statistics generation, we provide information that does not contain your personal data to the Google Analytics service.

Due to the nature of our business, we use the CloudFlare cloud service to transfer and store information, including your personal data. Moreover, such information is hosted on servers in the European Union and the United States of America.

We may also transfer information to countries outside the European Economic Area. The level of protection of personal data in these countries may vary.

However, our partners in such jurisdictions are always bound by contractual obligations to maintain an adequate level of protection of the transmitted data, and we take all possible measures to ensure the confidentiality of the information you provide.

In the event the Companies participate in mergers and acquisitions transactions, it may be necessary to transfer your personal data to our future partners, and we guarantee the confidentiality of that data.

With your consent, we may provide information about you to companies, organizations, or individuals not listed in this Privacy Policy.

We may disclose your personal data in the event that such a disclosure is necessary for the following purposes:

1. compliance with the requirements of legislation, a court decision, or the request of a state authority or body;
2. ensuring compliance by users of the Trading Platform with the Client Agreement and conducting internal investigations;
3. preventing, detecting, suppressing, and investigating cases of fraud, as well as improving security systems on the site finrooms.com;
4. protecting the rights and property of the Companies and users of the Trading Platform and society as a whole;
5. in other cases provided by law.

8. Technical information protection

To ensure the security of information provided by users, we have implemented special rules and technical measures to protect information.

We use a server certificate and a Secure Sockets Layer (SSL) encryption system for transmitted data. Thus, all operations carried out on the website finrooms.com are well protected.

9. Passwords

When registering on the site finrooms.com, you specify your email address and set your own password for your account.

We do not have the right to make changes to such data and cannot be held responsible for how you ensure its confidentiality.

We ask you to immediately report any unauthorized or other suspicious activities related to the use of your account.

10. The use of services by minors

The site finrooms.com is an open resource, but is not intended for use by persons under the legal age in accordance with applicable law.

In the event that we become aware that a minor has provided or attempted to provide his or her personal information to register on the site finrooms.com, we delete such information from the Companies' servers.

11. Changes

From time to time, we may make changes to this Privacy Policy, but the content of such changes will never limit your rights with respect to your personal data to a greater extent than is established by applicable law.

In the event of changes, they enter into force from the moment of posting the amended text of the Privacy Policy on the website finrooms.com at finrooms.com, unless a different deadline is specified for the changes to enter into force. We inform you of such changes by email.

If you do not agree to the amended edition of the Privacy Policy, we ask you to stop using the services of the Company and block your account on the website finrooms.com via the interface in your account or by contacting the Company's client support service using the contacts listed in section 12 of the Client Agreement, having previously withdrawn the funds from your account on the Trading Platform.

12. Contacts

If you have any questions or would like to receive additional information regarding the processing of your personal data, to check what is being processed, or to withdraw your consent to such processing, you can contact us at support@finrooms.com.