



Privacy Policy
Elite Crescent Capital
February 2022



Elite Crescent Capital

Privacy Policy

1. INTRODUCTION

Elite Crescent ("we," "us," or "our") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal information when you interact with us, use our services, or visit our website.

Your privacy is of utmost importance to us, and we are dedicated to being transparent about our privacy practices and giving you control over your personal information. We encourage you to read this Privacy Policy carefully to understand how we process your personal information and what rights you have in relation to it.

By using our services or visiting our website, you agree to the collection, use, and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, please do not use our services or visit our website.

This Privacy Policy applies to all users of our services, including customers, partners, and visitors to our website. It should be read in conjunction with our Terms of Service and any other agreements or terms that govern your use of our services.

If you have any questions or concerns about our Privacy Policy or how we handle your personal information, please contact us using the details provided in the "Contact Us" section of this Privacy Policy.

2. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following categories of personal information about you:

1. Personal identification information: This may include your name, date of birth, Social Security number or national identification number, passport number, and any other information required to verify your identity.
2. Contact information: This may include your residential address, email address, telephone number, and any other contact information you provide to us.
3. Financial information: This may include your bank account details, credit/debit card information, financial history, transaction details, and any other financial information required for us to provide our services.
4. Employment and education information: This may include your employment history, education background, professional qualifications, and any other related information.

5. Technical information: This may include information about your computer or device, including your IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website or services.
6. Usage data: This may include information about how you use our website, products, and services, including the pages you visit, the time and date of your visit, the time spent on those pages, and any other related usage data.
7. Marketing and communication preferences: This may include your preferences in receiving marketing materials from us and our third parties and your communication preferences.
8. Any other information you provide to us: This may include any other personal information that you choose to provide to us when filling out forms, participating in surveys, using our services, or corresponding with us by phone, email, or otherwise.

Please note that we may also collect and process personal information about you from third parties, such as credit reference agencies, fraud prevention agencies, and publicly available sources. We may also receive personal information about you from other companies within our group, our business partners, suppliers, and subcontractors.

3. HOW WE USE YOUR PERSONAL INFORMATION

We may use the personal information we collect about you for the following purposes:

1. To provide our services: We use your personal information to fulfill your requests, provide you with our products and services, and manage your account with us.
2. To verify your identity: We use your personal information to verify your identity and to comply with our legal obligations, such as anti-money laundering, know-your-customer, and other regulatory requirements.
3. To communicate with you: We use your contact information to send you important notices, updates, and other communications related to our products and services, and to respond to your inquiries and requests.
4. To process transactions: We use your financial information to process payments, facilitate transactions, and provide you with the necessary financial services.
5. To improve our products and services: We use your usage data, feedback, and other information to analyze and understand how our products and services are being used, and to make improvements and enhancements.
6. To personalize your experience: We use your personal information to tailor our website, products, and services to your preferences and interests, and to provide a more personalized experience for you.
7. For marketing purposes: We use your personal information to send you marketing materials, promotions, and other information about our products and services that may be of interest to you, as well as those of our selected partners, but only if you have consented to receive such communications.

8. For legal and regulatory compliance: We may use your personal information to comply with legal and regulatory requirements, as well as to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
9. For any other purpose with your consent: We may use your personal information for any other purpose for which you have given us your consent.

Please note that we may also use your personal information in an anonymized or aggregated form, which cannot be used to identify you, for research, statistical analysis, and other business purposes.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

4. WHY WE PROCESS YOUR INFORMATION

We process your personal information for various reasons, as outlined below. In certain cases, we may rely on more than one legal basis for processing your information.

1. To fulfill a contract: We may process your personal information when it is necessary to fulfill a contract we have entered into with you or to take steps at your request before entering into a contract. This includes providing our products and services, managing your account, and processing transactions.
2. To comply with legal obligations: We may process your personal information to comply with our legal obligations, such as anti-money laundering, know-your-customer, tax, and other regulatory requirements.
3. To protect our legitimate interests: We may process your personal information to protect our legitimate business interests, including maintaining the security and integrity of our systems, improving and developing our products and services, and maintaining our relationships with customers, suppliers, and other business partners.
4. With your consent: In some cases, we may process your personal information based on your consent. This may include sending you marketing communications, processing sensitive personal information, or sharing your information with third parties for specific purposes. You have the right to withdraw your consent at any time.
5. For the performance of a task carried out in the public interest: We may process your personal information to carry out a task in the public interest or for the exercise of official authority vested in us.
6. To protect your vital interests: In rare circumstances, we may process your personal information to protect your vital interests or the vital interests of another person, such as in the case of a life-threatening emergency.
7. For the establishment, exercise, or defense of legal claims: We may process your personal information to establish, exercise, or defend our legal claims or those of others, or when necessary for the purposes of obtaining legal advice or protection.

We will always ensure that there is a legal basis for processing your personal information, and we will document our decision-making process to demonstrate compliance with applicable data protection laws and regulations. If you have any questions about the legal basis on which we process your personal information, please contact us using the details provided in the "Contact Us" section of this Privacy Policy.

5. WHEN WE SHARE OR DISCLOSE YOUR INFORMATION

We may share or disclose your personal information with third parties under certain circumstances, as described below. We will always ensure that appropriate safeguards are in place to protect your information when it is shared or disclosed.

1. **Affiliates and subsidiaries:** We may share your personal information with our affiliates and subsidiaries for the purposes of providing our products and services, managing your account, or improving our offerings.
2. **Service providers:** We may share your personal information with third-party service providers who perform services on our behalf, such as payment processors, IT service providers, marketing agencies, and customer support providers. These service providers will only have access to the information necessary to perform their functions and are contractually obligated to protect your information and use it only for the purposes for which it was disclosed.
3. **Business partners and introducers:** We may share your personal information with our business partners and introducers, such as banks, financial institutions, or other parties involved in the provision of our products and services. We will always ensure that any such sharing is in compliance with applicable data protection laws and regulations.
4. **Legal and regulatory authorities:** We may disclose your personal information to legal and regulatory authorities when required by law, regulation, or legal process, or to respond to requests from government or public authorities.
5. **Mergers, acquisitions, and corporate restructuring:** We may share or transfer your personal information in connection with a merger, acquisition, or corporate restructuring involving our company, or the sale or transfer of all or a portion of our business or assets.
6. **Protection of our rights and interests:** We may disclose your personal information if we believe it is necessary to protect or defend our rights, property, or the safety of our employees, customers, or others, or to enforce our terms and conditions or other agreements.
7. **Anonymized or aggregated data:** We may share anonymized or aggregated data with third parties for research, analysis, or marketing purposes. This data will not include any personal information that could be used to identify you.

We will always ensure that any third parties we share your personal information with are bound by appropriate data protection agreements or other legal instruments that protect your information and comply with applicable data protection laws and regulations. If you have any questions about our data sharing practices, please contact us using the details provided in the "Contact Us" section of this Privacy Policy.

6. WHERE WE TRANSFER AND STORE YOUR PERSONAL INFORMATION

We operate globally, which means that your personal information may be transferred, stored, and processed in countries outside of your country of residence. This includes countries that may not have the same level of data protection as your home country. In these cases, we take appropriate measures to ensure that your personal information is protected and treated securely in accordance with this Privacy Policy and applicable laws and regulations.

1. **European Customers based in the EEA:** The personal information that we collect from you may be sent, stored at, and used in a country outside the European Economic Area (EEA, consisting of the EU, Norway, Iceland, and Liechtenstein), which may not offer the same level of protection as the EEA. It may also be processed by staff operating outside the EEA who work for us, one of our suppliers, introducers, business partners, agents, or subcontractors. By submitting your personal data, you agree to this transfer, storing, and processing.
2. **Customers from the rest of the World:** The data that we collect from you may be stored in a jurisdiction that is different from the country in which the specific entity you are dealing with is registered and established. It may also be transferred outside of the country in which the specific entity you are dealing with is registered and established and processed by staff operating in another country but who are nevertheless employed by us, one of our suppliers, introducers, business partners, agents, or subcontractors. By submitting your personal data, you agree to this transfer, storing, and processing.

In both cases mentioned above, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with our legal obligations and standards. Where it is not possible and we are required to disclose your personal information, for example, because we are required by law to disclose your personal information, we will do so in accordance with applicable legal and regulatory obligations. You may contact us anytime using the contact details provided in the "Contact Us" section of this Privacy Policy if you would like further information on such safeguards.

7. INFORMATION SECURITY

We are committed to protecting the security and confidentiality of your personal information. To achieve this, we implement and maintain appropriate technical and organizational measures designed to safeguard your personal information from unauthorized access, disclosure, alteration, damage, loss, or unlawful or accidental destruction.

Examples of the security measures we use include, but are not limited to:

1. **Encryption of personal information:** We use encryption technologies to protect your personal information when it is transmitted over the internet and when it is stored on our servers.
2. **Access controls:** We limit access to your personal information to employees, contractors, and third parties who have a legitimate need to access the information for the purposes outlined in

this Privacy Policy. They are required to maintain the confidentiality of your personal information and are subject to strict contractual obligations.

3. **Back-up servers and facilities:** We maintain secure back-up servers and facilities to protect your personal information from accidental loss or damage.
4. **Testing and monitoring:** We regularly test, assess, and evaluate the effectiveness of our security measures and update them as necessary to maintain the highest level of protection for your personal information.

In addition, we have put in place procedures to deal with any suspected personal data breach. We will notify you and any applicable regulator of a breach where we are legally required to do so.

8. INFORMATION RETENTION

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including any legal, regulatory, business, or reporting requirements. When determining the appropriate retention period, we consider factors such as applicable laws, regulations, our agreements with you, and the expectations and requirements of our customers.

After the retention period has passed, we will securely delete or anonymize your personal information so that it can no longer be associated with you. In some cases, we may continue to use aggregate or anonymized data for statistical purposes, but this data will not be identifiable as yours.

In specific situations, we may be required to retain your personal information for a longer period to comply with legal, regulatory, or internal compliance obligations. For example, we may need to retain your information for an extended period in response to a court order or investigation by law enforcement or regulatory authorities.

If you have any questions about our data retention practices, please contact us using the contact details provided in the "Contact Us" section of this Privacy Policy.

9. YOUR RIGHT OF ACCESS TO YOUR PERSONAL INFORMATION

Subject to certain legal conditions, you have rights in relation to your personal information that we process. These rights may vary depending on your jurisdiction, but generally include:

1. **Access to personal information:** You have the right to request access to the personal information we hold about you, as well as information about our processing activities. We may ask you to provide evidence of your identity before providing access, and we may be unable to disclose some information for legal or regulatory reasons. You can submit a request for access by contacting us using the contact details provided in the "Contact Us" section of this Privacy Policy.
2. **Right to rectification:** If your personal information is inaccurate, outdated, or incomplete, you have the right to request that we correct or update it.

3. Right to erasure (right to be forgotten): You have the right to request that we delete your personal information, unless we are required to retain it for legal, regulatory, or internal compliance reasons.
4. Right to object to or restrict processing: You have the right to object to the processing of your personal information for specific purposes or to request that we restrict processing in certain situations.
5. Right to data portability: In some jurisdictions, you may have the right to request that we provide you with a copy of your personal information in a structured, commonly used, and machine-readable format so that you can transfer it to another data controller.
6. Right to withdraw consent: If our processing of your personal information is based on your consent, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before your withdrawal.

To exercise any of these rights, please contact us using the details provided in the "Contact Us" section of this Privacy Policy. We will respond to your request within a reasonable timeframe, and in accordance with any applicable laws and regulations.

If you are not satisfied with our response or believe that our processing of your personal information does not comply with the applicable data protection laws, you have the right to lodge a complaint with the relevant data protection authority in your jurisdiction. We can provide you with the contact details of the relevant authority upon request.

10. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, applicable laws, or regulations. Any changes we make to our Privacy Policy will be posted on our website, and, where appropriate, we will notify you by email or through other means of communication.

Please check our website regularly to stay informed about any updates or changes to our Privacy Policy. Your continued use of our services after the effective date of any changes to our Privacy Policy indicates your acceptance of the revised Privacy Policy.

If we make significant changes to our Privacy Policy that materially affect our processing of your personal information, we will provide you with a more prominent notice, such as by sending you an email or displaying a notification within our services. In such cases, we may also request your consent to the updated Privacy Policy, as required by applicable laws and regulations.