TITANEDGE SECURITIES LTD

GENERAL DATA PROTECTION REGULATION

(GDPR) POLICY

Version	Author	Purpose/Change	Approved by:	Date
1	Compliance Department	First Draft	Board of Directors	18/11/2022

95 Griva Digeni, GRIGORIOU BUILDING, Mezzanine floor, Office no. 1, Saint Nicholas, 3101 Limassol, Cyprus

+357 25261736

info@titan-edge.com

Titanedge Securities Ltd with Registration Number HE 411909, is regulated and authorized by the Cyprus Securities and Exchange Commission under license number 405/21.

Overview

1. Titanedge Securities Ltd (hereafter the **"Company", "we" or "us"**), is authorized and regulated by the Cyprus Securities and Exchange Commission **("CySEC" or "Regulator"**), under authorization number 405/21 to offer investment and ancillary services (as seen on the Company's website and on CySEC's website at www.cysec.gov.cy) under the Investment Services and Activities and Regulated Markets Law of 2017 L.87(I)/2017, as subsequently amended from time to time **("the Law"**).
2. The Company is committed to protecting your personal information and respects its' Clients' expectations on privacy and confidentiality. Furthermore, the Company is dedicated to upholding all the regulations related to EU General Data Protection Regulation.
3. The General Data Protections Regulation, known as GDPR, is a legal framework that sets guidelines for the collection and processing of personal information of natural persons who live in the European Union (EU). Specifically, this regulation meshes the privacy laws of the Member States and is focused on the movement of data outside the Union.
4. General Data Protection Regulation (EU) 2016/679 is repealing Directive 95/46/EC and aims to increase the protection of natural persons, to remove the obstacles to flows of personal data within the Union and ensure that the level of protection of the rights and freedoms of natural persons with regards to the processing of such data is equivalent in all Member States.

Data Controller

Titanedge Securities Ltd is acting as the controller of your data.

The Company has appointed a Data Protection Officer to oversee and monitor, among other, the Company's compliance under applicable data protection laws and to act as the Company's point of contact for the Commissioner in Cyprus. You may contact the Company's Data Protection Officer by email at dpo@titan-edge.com or via post at the Company's Business Address at 95 Griva Digeni, GRIGORIOU BUILDING, Mezzanine floor, Office no. 1, Saint Nicholas, 3101 Limassol, Cyprus.

Personal Data

Personal data, or personal information, means any information relating to an identified or identifiable natural person ('data subject'). It does not include data where the identity has been removed (anonymous data).
An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

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For details about the types of information being collected, you may refer to our Privacy Policy.

Personal Data Rights

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

- **Right of access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Right to data portability** to obtain and use your personal data. This means that clients can reuse their details, for example, copy and transfer the information from one secure environment to another. Further details including limitations and specifics can be accessed via our various policies;
- **Right to restrict or object to the processing** of your personal data. Individuals may object to or restrict the processing of personal data, though this is not guaranteed by GDPR as an absolute right. Conditions apply;
- **Right of erasure** of your personal data (also known as the "right to be forgotten"). This enables clients to ask us to delete or remove their personal data. Note, however, that we are obliged by regulation to keep our client information records and we may not be able to comply with your request for erasure. We make sure that your personal data will be kept in a secure and isolated environment for regulation purposes only;
- **Right to rectification** of your personal data. All individuals have the right, under GDPR, to correct or complete any inaccurate or incomplete personal data, depending upon the purpose.

Further to the above and under the provisions of GDPR, all clients may request to:

- Access personal data;
- Know that their data is undergoing processing;
- Know why it is being processed;
- Discover which categories of data are being processed;
- Learn who will receive the data;
- Know how long the data will be stored and the criteria used to determine the period;
- Offer complaints to appropriate authorities;
- Know if automated decision-making tools are used;
- Know if their personal data is transferred to any third party and to be informed of any safeguards used will transferring the data.

5. If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at dpo@titan-edge.com.

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