



**TERMS OF PERSONAL  
DATA  
PROCESSING**

## TERMS OF PERSONAL DATA PROCESSING

This document describes the main aspects of the Global Data Protection Regulation (GDPR) and explains the rights and obligations of the Clients and the RFund AIFLNP V.C.I.C. Ltd, Promachon Eleftherias, 19, Limassol 4103, Cyprus (hereinafter: the "Company") - regulated company by the CySEC, license No. LPAIF118/2014.

The Company respects your privacy and is determined to protect your personal data. The purpose of this document is to inform you as to how we look after your personal data when you visit our website and sign-up to our services and your privacy rights in regards to how the data protection law protects you.

It is essential to read this document so that you are fully aware of how and why we are using your data. The Company is the controller and responsible for your personal data. For all data matters contact our Data Protection Officer at [nikolay.g@rfund.eu](mailto:nikolay.g@rfund.eu).

Our website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Your personal data will be collected in accordance with the current legislation and the main purpose of the collection of this information is **fulfillment of legal requirement**.

If your personal data is used for any other purpose(s), the accorded consent will be requested. You acknowledge and agree that in case of the need to provide personal data to third parties in order to achieve the above objectives, as well as the need to involve third parties to service provision in the given purposes, the Company reserves the right to transfer its functions and powers to another person.

The Company does not transfer data outside the EEA.

The Company may collect the following data:

E-mail, Name, Surname, Phone, Address of residence, Date and place of birth, Economic profile, information about my personal Knowledge and Experience in relation to financial instruments provided by the Company and other information relating to my personality if this requires by the legal requirements.

### COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

The Company can perform the following operations / set of operations with the personal data in accordance with applicable law, whether or not by automated means: collection; recording; organisation; structuring; storage; adaption or alteration; retrieval; consultation; use; disclosure by transmission, dissemination or otherwise making available; alignment or combination; restriction; erasure or destruction.

Your data is processed with the following principles:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');



- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed('storage limitation');
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality").

The GDPR includes the following rights for the Clients: the right to be informed; the right of access; the right to rectification; the right to erasure; the right to restrict processing; the right to data portability; the right to object; the right not to be subject to automated decision-making including profiling.

In respect of the Client's rights the Company informs you that you are able to exercise the above-mentioned rights if this does not contradict the legal requirements in relation to the Prevention of Money Laundering and Terrorist Financing Laws, Record Keeping obligations of the Company etc.

The Company has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, the Company limits access to your personal data to those employees and other third parties who require access to limited data of clients. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. The Company has put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

To exercise all relevant rights, queries or complaints to any data protection matter between you and the Company, please in the first instance contact our Data Protection Officer at [nikolay.g@rfund.eu](mailto:nikolay.g@rfund.eu).

