

# **HIGHSKY BROKERS, a.s.**

## **PRIVACY & COOKIES POLICY**

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## 1. INTRODUCTION

### Scope of the Privacy & Cookies Policy

HighSky Brokers, a.s. (the “**Company**”) respects your privacy and is committed to protecting your personal data. This Privacy & Cookies Policy (the “**Policy**”) will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Policy is provided in a layered format in the Contents Page so you can click through to the specific areas set out below and you can download the PDF version of the Policy.

This Policy applies to existing as well as potential clients that receive the services of the Company through its websites, platform(s) and mobile application(s) as well as visitors of the Company’s websites (the “**Services**”) and aims to give you information on how the Company collects and processes your personal data through your use of these Services.

This Company’s Services are not intended for persons under 18 years of age and we do not knowingly collect data relating to them.

### Controller

The Company is the controller and responsible for your personal data.

**It is important that you read this Policy together with any other privacy notice the Company may provide on specific occasions when the Company is collecting or processing personal data about you so that you are fully aware of how and why the Company is using your data. This Policy supplements the other notices and is not intended to override them.**

## 2. PRIVACY POLICY

### Personal Data

In order for the Company to provide its clients with the best services, once an individual applies to

become a Company client, he/she is being asked to provide a number of personal data.

According to the applicable **General Data Protection Regulation (2016/679) (the “GDPR”)**: *Personal data is defined as any information relating to an identified or identifiable natural person; an identifiable 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, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.*

Any personal Data that will be collected by the Company through the provision of the Services, shall be processed according to the GDPR and according to any applicable Law of the Czech Republic.

### Collection of Personal Data

Collection of personal data shall assist the Company in the provision of its Services and for operational and business purposes including, inter alia, meeting regulatory obligations, safeguarding a client’s rights, evaluating the service needs of a client, processing a client’s requests and transactions, keeping a client informed about products and services that may be of interest to the client, and providing a client with better service experience.

### The data we may collect about you:

- **Identity/Application data:** full name, birth date, identity, tax registration number, social security number, occupation, assets, and income.
- **Contact data:** includes billing address, delivery address, email address and telephone numbers.
- **Transaction data:** Information about client’s transactions with the Company and/or its affiliates, records of past communications. The later may include: client’s trading account balances, trading activity, past inquiries and responses.
- **Verification data:** This will be required to verify a client’s account which may include identity verification e.g. passport and/or

identity card and residential address verification e.g. might include a utility bill and/or a Bank statement and/or any other additional documentation and/or any other additional documentation verifying the financial details and/or status of a client and which may be asked from the Company's Compliance Department accordingly. All requirements on verification information are deriving from applicable legislation on the Act No. 253/2008 Coll. June 5, 2008 on selected measures against legitimisation of proceeds of crime and financing of terrorism as amended from time to time, and all relevant Regulations and Directives require financial institutions to collect information and take action, where necessary to verify a client's identity.

- **Profile data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. We may log information about your use of the Services including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our websites.
- **Financial data:** If a client will subscribe to the Company's Services, the latter will collect and process certain financial or bank card information, and other information necessary for the Company to process the transaction. This information is stored when adding funds to your trading account or receiving funds. This data may be stored with a third party processor as per applicable legal regulations.
- **Marketing and Communications Data:** might include your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories** of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We use different **methods to collect data** from and about you including through:

- Registration process;
- Provision of the Services;
- Subscriptions;
- Competitions, promotions, surveys;
- Automated technologies interactions e.g. use of cookies;
- Third party publicly available sources e.g. analytics providers such as Google, advertising networks, search information providers;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- Identity and Contact Data from publicly available sources e.g. government gateways.

While ensuring compliance, the Company also ensures the protection of personal data, the lawful and fair processing. The protection of personal data is certain for every individual and is processed in a manner that minimizes risks to confidentiality and integrity of the personal data.

Processing of personal data is performed in accordance with all applicable laws and regulations of the Czech Republic and the European Union. The Company is obliged to process personal data fairly and lawfully, for specified, explicit and legitimate purposes, and processed to the extent they are relevant, appropriate and not exceeding in relation to the purposes of processing. More information on the details of the processing of personal data is found below.

#### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## Use of Personal Data

The Company may collect, disclose, process and share, any your personal data further to regulatory and legal requirements or as per your consent and as described in this present Policy.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [Contacting us](#).

The Company uses personal data, further to regulatory requirements and upon your consent for the provision of Services and business related purposes:

- Websites use: in order to enable a visitor and or a client to use the Company's websites, certain personal data are essential to enable the use of the Websites and use of features. Certain personal data e.g. cookies are needed in order to be able to use the Company's Websites;
- Account setup and administration: Personal Data are used in order to enable account registration, administration and operation; The Company may use Personal Data provided to send alerts, emails, SMS for you to view on the status of your trading account e.g. verification of account or margin call or other information;
- Marketing material: to deliver marketing and news notifications across its clients via the Services. Such personal data include, inter alia,

email address, telephone numbers, text messaging (SMS), platform pop-ups and push notifications through the Services. Marketing material will include information on how to opt out of receiving such material and a client is able to manage his information and marketing preferences. The Company may still proceed to distribute important information through the Services, required from time to time as per applicable regulations relating to trading account details and subscriptions;

- Researching and development: to enable internal research and development purposes so as to develop the Services. In addition, through surveys that a client can choose to complete or not;
- Social Networking: some of the Services may include social networking features, advertising and interactive programs that a client will choose to use from time to time;
- Record keeping: due to regulatory requirements, the Company is obliged to maintain records in order to meet its legal obligations. Any information stored is controlled and managed by the Company under strict security measures;
- Legal obligations: to meet certain legal and regulatory obligations, the Company is retaining personal data which is using and processing for compliance reasons which include, inter alia, identification of clients or prevention, detection, investigation of a crime. The Company may use personal data of its clients, which include inter alia identification documents, telephone recordings, financial information etc. in order to meet internal and external audit requirements, information security purposes and as the Company considers to be necessary, under applicable legislation, regulatory requests, resolution of disputes, governmental and public authorities requests, enforcement of terms and conditions and protection of fundamental rights.

## Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably

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

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Processing of Personal Data

Processing of Personal Data is done lawfully further to regulatory and legal requirements and on the basis of the consent of a client or the necessity for the performance of the contract to which the client is the party to or in order to take steps at the request of a potential client prior to entering into a contract.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data.

The Company processes and distributes i.e. shares or discloses personal data, where necessary to provide its Services or conduct its business operations as described below. In doing so, the Company is acting in compliance with data privacy and security requirements.

- a. **Regulators:** The Company may disclose the client's personal data to governmental and public authorities as required and as permitted by, or in order to comply with, applicable Laws and Regulations. This may include disclosing personal information in order to cooperate with regulatory authorities and law enforcement agencies, as may be necessary to protect the rights and/or property of the Company.
- b. **Internal:** The Company may process and distribute personal data, internally, in order to conduct its business operations always in line with its internal privacy policies and procedures. In addition, the Company might distribute information to its intra-group related businesses (within and outside the EEA) if necessary for the provision of the Services,

e.g. account administration, customer and technical support, sales and marketing. All of the employees of the Company and related companies are bound to follow the Company's personal data privacy policies and procedures when processing such personal data.

- c. **Third Parties:** may include sharing such personal data with third party companies that provide services to the Company, which include, inter alia, administration and customer support services for client's trading accounts and/or facilitate transactions with the Company and/or perform identity and credit checks, including those that provide professional, legal, marketing and/or accounting services to the Company and/or agents acting on behalf of the Company and/or providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services.

Third Party companies that assist the Company in providing services are required to maintain the confidentiality of such data to the extent they receive it and to use the personal data only in the course of providing such services and only for the purposes dictated by the Company. The Company's Third Party providers are not permitted to share or use personal data the Company distributes to them for any other purpose than their contractual obligation with the Company.

### Third Party Links

Our Services contain links to websites operated by Third Parties. The Company provides the links on its Services for your convenience, but it does not review, control or monitor the privacy or other practices of websites operated by Third Parties. The Company is not responsible for the performance of websites operated by Third Parties or for your business dealings with them.

The Company may transfer within and/or outside of the EEA data for contract performance and for

legitimate business continuity purposes. In doing so the Company is ensuring transfer in compliance with the GDPR. Such measures may include, inter alia, transferring data to a recipient in a country that provides adequate protection or has certified compliance.

Where we use certain service providers, we will use specific contracts approved which give personal data the same protection it has in Europe.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

The Company maintains adequate security standards for the premises and secure areas for storing personal and sensitive data.

- a. Encryption: Personal Data which is stored in an electronic format on all computers, including laptops and external hard discs, are securely controlled by password protection and are encrypted. Also, restrictions for the accessing of personal data apply for each department accordingly.
- b. Soft Copy: Personal Data is electronically stored in an encrypted format on the Company's servers that might be placed within and/or outside the European Union.
- c. Hard Copy: Hard Copies of Personal Data are stored at the offices of the Company. The Company takes steps to ensure that the information collected is stored according to the requirements of applicable laws wherever the data is located.
- d. Telephone Recordings: Any telephone conversations and/or electronic communications between the Company, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services are being recorded, according to the applicable law.

### **Storage Period of Personal Data**

The Company is obliged by Czech legal requirements and regulations to store personal data of its clients for a period of at least ten (10) years after termination of the business relationship with a client.

In addition, the Company might be obliged to maintain records for a longer period of time, where necessary, due to any governmental and/or court orders in order to protect its rights.

When personal data are no longer needed, the Company is securely deleting and/or destroying them.

### **Access, Rectification & Erasure of Personal Data**

Valuing its client's right to access of personal data, the Company will respond to such client requests and will comply and provide its clients any data requested. The Company hereby reserves its right to charge a relevant fee for providing another record and/or copy of personal data to a client.

The Company is taking every reasonable step so as to ensure that personal data which are inaccurate are rectified or deleted. A client may contact the Company and request to amend and/or correct and/or update and/or delete any of his/her personal data. More information on the contacting details are found below.

It is important to note that deletion of personal data might not always be possible due to legal requirements and other obligations and factors.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **3. COOKIES POLICY**

### **Cookies**

Cookies are a kind of short term memory for the website. They are stored in a visitor and/or client's (the "User") browser and enable Services to

'remember' little bits of information between pages or visits. Some of the purposes of installation of Cookies or similar applications may also require the separate consent of the User.

### **Use of Cookies**

Use of cookies and other tracking technologies are standard across the Services through which personal data is collected. A User can control and manage the use of cookies through the Services and more information is provided below.

The Company uses cookies, to enable it to provide a User with a better experience in using its Services by sending small text files from the Company's servers to a User's computer.

If a User does not wish to receive cookies, he/she may be able to change the settings of the browser to refuse all cookies or to have the computer notify him/her each time a cookie is sent to it, and thereby give the choice whether to accept it or not. However, this may impair the quality of the Services that are being provided in relation to the trading account.

The Company shall not be liable for misuse or loss of personal data resulting from cookies on the Services that the Company does not have access to and/or control over.

### **Consent to Cookies**

Throughout your use of the Company's Services you will be asked to provide your consent on the use of Cookies and by continuing to use the Company's Services, you are granting your consent for Cookies to be installed.

### **Types of Cookies**

There are various types of Cookies needed to be used in order to enable the provision of the Services which include, inter alia, absolutely necessary cookies essential to enable navigation through the Services, performance cookies which are used to improve use of the Services, functionality cookies which are used to remember changes in choices a User requested and marketing cookies used to evaluate performance of advertisements and visits on the Services.

### Technical Cookies and Cookies serving aggregated statistical purposes

**Activity strictly necessary for the functioning of the service:** Use of Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of the same, for example in relation to the distribution of traffic.

**Activity regarding the saving of preferences, optimization, and statistics:** Use of Cookies to save browsing preferences and to optimize the User's browsing experience. Among these Cookies are, for example, those to set the language and the currency or for the management of first party statistics employed directly by the owner of the site.

### Other types of Cookies or third-party tools

Some of the services listed below collect statistics in aggregated form and may not require the consent of the User or may be managed directly by the owner – depending on how they are described – without the help of third parties.

If any third-party-operated services are listed among the tools below, these may be used to track Users' browsing habits – in addition to the information specified herein and without the owner's knowledge.

**Interaction with external social networks and platforms:** These services allow interaction with social networks or other external platforms directly from the pages of the Services. The interaction and information obtained are always subject to the User's privacy settings for each social network. If a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when Users do not use it.

### **Google +1 button and social widgets (Google Inc.)**

The Google button and social widgets are services allowing interaction with the Google+ social network, provided by Google, Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA



**Facebook Like button and social widgets (Facebook, Inc.)**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network, provided by Facebook, Inc.  
Personal Data collected: Cookie and Usage data.  
Place of processing : USA

**Tweet button and social widgets (Twitter, Inc.)**

The Tweet button and social widgets are services allowing interaction with the Twitter social network, provided by Twitter, Inc.  
Personal Data collected: Cookie and Usage data.  
Place of processing: USA

**Linkedin button and social widgets (LinkedIn Corporation)**

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network, provided by LinkedIn Corporation.  
Personal Data collected: Cookie and Usage data.  
Place of processing: USA

**YouTube button and social widgets (YouTube Corporation)**

The YouTube button, video and social widgets are services allowing interaction with the Youtube social network, provided by YouTube, LLC.  
Personal Data collected: Cookie and Usage data.  
Place of processing: USA

Statistics

The services contained in this section are used to the owner to monitor and analyse traffic data and are used to keep track of User behaviour.

**Google Analytics with anonymized IP (Google Inc.)**

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses Personal Data collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google.  
Google may use this personal information to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics makes anonymous your IP address. The anonymisation shortening work within the confines of the EU Member States or other countries participating in

the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google's servers and statements within the United States.

Personal Data collected: Cookie and Usage data.  
Place of treatment: USA

Displaying content from external platforms

The Services allow you to view content hosted on external platforms directly from the pages of the Services and interact with them. If a service of this kind is installed, it may still collect web traffic data for the pages where the service is installed, even when users do not use it.

**Google Maps Widget (Google Inc.)**

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses Personal Information collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics makes anonymous your IP address. The anonymisation shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google's servers and statements within the United States.

Personal Data collected: Cookie and Usage data.  
Place of treatment: Google Maps - USA

How can you manage Cookies?

You can control and/or delete cookies as you wish directly from within your own browser and prevent – for example – third parties from installing them. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. It is important to note that by disabling all Cookies, the functioning of the Services may be compromised. For further information about cookies and how to disable them, please refer to [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### 4. SECURITY

Personal Data are processed in a manner that ensures appropriate security and confidentiality, including for preventing unauthorised access to or use of personal data.

The Company shall take all necessary measures in order to protect the security of all personal information. The Company shall protect all data from loss, misuse, unauthorised access or disclosure, alteration, or destruction.

The Company shall not be liable for unlawful or unauthorised use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use of the Services.

The Company maintains policies and procedures and has measures in place in order to ensure high levels of protection of personal data which include, inter alia, appropriate restrictions on permissions of access to personal information, controls and monitoring of storing and distribution of data as well as Data Protection Impact Assessments.

All employees and providers of the Company are required to follow certain privacy and security policies and procedures.

The Company is not responsible for the security and privacy of any Third Party and/or Social Networking services or any information collected by them. It is recommended that a User should always review the said providers privacy policies.

#### Opt Out

In case a client wishes to remove his/her name and/or personal data from the Company's database, he/she is advised to inform the Company in writing by addressing his/her request using the [Contact Us](#) option on the relevant Service.

**It is important to note that deletion of personal data might not always be possible due to legal requirements and other obligations and factors.**

#### 5. AMENDMENTS

Please read this Policy carefully and [Contact us](#) in case you have any questions about our privacy practices or your personal information choices. We reserve the right to amend this Policy at any time by posting the new version. It is important that you check back for updates to this Policy. If we make changes we consider to be important, we will let you know by placing a notice on the relevant Services.

#### 6. CONSENT

A User by visiting and/or accessing the Company's website will be required to consent to the present Policy for the collection, maintenance and/or use the personal data as per the present Policy.

#### 7. RIGHTS AND CONTACT INFO

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data the Company holds about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data the Company holds about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. **Note, however, that we may not always be able to comply with your request of erasure of specific information for specific legal and regulatory reasons which will be notified to you, if applicable, at the time of your request.**

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask the Company to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

For any questions and clarifications you may require, please contact our Company or should you require to file a complaint. You also have the right to withdraw your consent to use your personal data for marketing purposes in the future, in whole or in parts, or request deletion of your personal data. Note, however, that we may not always be able to comply

with your request of erasure of specific information where legal and regulatory reasons apply.

Please feel free to direct such requests, or other questions and comments regarding this Policy via email to [personaldata@highsky.cz](mailto:personaldata@highsky.cz) or via phone or post to the following details:

#### **Contact Information**

HighSky Brokers, a.s.  
Vodičkova 710/31  
110 00 Praha 1

Telephone: +420 222 767 100

E-Mail: [personaldata@highsky.cz](mailto:personaldata@highsky.cz)

- **File a complaint** with the local Supervisory Authority if you consider that the processing of your personal data violates the GDPR.

#### **Contact information – Czech Supervisory Authority:**

**Úřad pro ochranu osobních údajů**

Pplk. Sochora 27

170 00 Praha 7

Web: <https://www.uoou.cz>

***Updated: May 2018***

## PERSONAL DISCLAIMER

I, the User of this website, hereby declare and agree that:

- i. I have carefully read and fully understand and accept the present Privacy and Cookies Policy;
- ii. The Company has the right to collect, process and store Personal Data in order to support, promote and realize our relations.
- iii. I consent to the processing of my personal data for the services provided by the Company and for the transferring of my information to countries or jurisdictions outside the European Economic Area in line with applicable laws;
- iv. The Company will not communicate or disclose such Personal Data to any third party, prior to receiving my consent, unless pertaining to:
  - a. company/companies to which the Company has partly or fully assigned the realization of the processing of such data in accordance with the law;
  - b. third party service providers required for the operation, support and administration of my trading account;
  - c. such communication or disclosure which may be required by law or by a court decision and;
  - d. where I am a client of the Company according to the Privacy and Cookies Policy which also applies to me.
- v. Unless otherwise specifically instructed by me, the Company will have the right to use such personal data, with the exception of Sensitive Personal Data, in order to remotely promote its financial products and/or any products/services provided by other affiliated companies.
- vi. I am aware that I am at any time entitled to receive information, have access, be able to rectify or refuse any further processing of my Personal Data pursuant to General Data Protection Regulation (EU) (2016/679), as amended or replaced from time to time and pursuant to relevant applicable local law.
- vii. I have the right at any time to withdraw my consent to the processing of my personal data for marketing purposes and my withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.