

# PRIVACY POLICY

This Privacy Policy pertains to I.S. Impressive Support LTD, a company registered in Cyprus under registration number HE 452015 and operating under the trading name Bo-Its. Our registered office is located at Anastasi Shoukri, Themis Tower, Limassol, 3105, Cyprus. This policy sets out our principles and procedures regarding the collection, processing, and storage of your personal data. By using our services, you consent to the terms and conditions laid out in this document. We are committed to ensuring the privacy and protection of your data. Should you have any queries concerning this policy, please do not hesitate to contact us.

## 1. PROCESSING OF PERSONAL DATA

### 1.1. Collection and Lawfulness

We process personal data based on lawful grounds such as consent, legal obligations, contractual necessity, and our legitimate interests.

### 1.2 Collection and Types of Personal Data

We collect necessary personal data to facilitate your interaction with our services, evaluate your application, and comply with relevant regulations.

The data includes but is not limited to:

- Personal identifiers (name, contact details, national identifier, if applicable)
- Demographics (date of birth, gender, marital status)
- Employment and financial data (occupation, income, employer's name, bank account details)
- Identification documents (passport or ID, utility bill, bank statement)
- Economic profile (wealth size, source of wealth)
- Technical data (IP address, device ID, cookie ID, device details, usernames, passwords, account history, activity, orders)

## 2. IDENTITY VERIFICATION AND USE OF PERSONAL DATA

We verify the identities of our customers and use the personal information for:

- ❖ Compliance with legal, regulatory, and contractual obligations
- ❖ Management of your account and services
- ❖ Provision of information, products, and services

- ❖ Fraud detection and prevention
- ❖ Direct marketing, with your consent

We employ technology for automated decision-making and profiling to enhance our services. If you believe our decision-making is inaccurate, you have the right to request a human review.

### **3. SHARING AND DISCLOSURE OF PERSONAL INFORMATION**

We may share your personal information with entities such as regulatory and law enforcement agencies, our associated companies, third-party service providers, advisors, partners, auditors, and potential purchasers or buyers of our business. We require these entities to respect your privacy and comply with data protection principles and this policy.

Personal data is only disclosed for lawful purposes and to authorized recipients, who are obliged to maintain the privacy of your information to the same extent we do.

### **4. RETENTION OF PERSONAL INFORMATION**

We retain your personal data for the duration of our business relationship and for a minimum of five years post-termination. In certain cases, data may be kept for more than five years due to legal, regulatory, or technical reasons.

### **5. COMPLIANCE WITH LEGAL OBLIGATIONS**

We also handle your personal information to fulfill our legal obligations.

In this context, we will utilize your personal data for the following purposes:

- Ensuring compliance with laws and regulations, including anti-money laundering laws.
- Meeting requirements set by tax authorities, courts, or other legal authorities as mandated by applicable laws.

To fulfill these purposes, we may share your personal data with the following entities:

- Our advisors, when their advice or assistance is necessary.
- Our auditors, as part of their auditing responsibilities.
- Third parties who help us perform background checks.
- Relevant regulatory or law enforcement agencies, as required by applicable laws.

## 6. GDPR

Your rights according to the General Data Protection Regulation (GDPR) are as follows:

- The right to access and obtain copies of the personal data we have about you.
- The right to request that we stop processing your personal data if it is causing you harm or distress.
- The right to request that we do not send you marketing communications.
- The right to request the deletion of your personal data.
- The right to request limitations on our data processing activities.
- The right to receive the personal data you have provided to us in a specified format, and to transmit that data to another data controller if desired.
- The right to request corrections to any incorrect personal data we hold about you.

Please note that these rights are not absolute, and there may be circumstances where we are permitted to deny requests based on certain exceptions.

As an agent or intermediary, it is your responsibility to inform individuals to whom you provide our services about any privacy notices or policies that we have made available for those services.

By using our services, you confirm that any personal data of individuals that you provide to us, either directly or on behalf of others, has been collected and disclosed in compliance with the relevant Data Protection legislation. When utilizing our services, you will take reasonable precautions to ensure that you and your employees, agents, and contractors do not submit, upload, or disclose any irrelevant or unnecessary information about individuals.

You will implement appropriate physical, technical, and organizational measures to safeguard personal data against accidental, unauthorized, or unlawful destruction, loss, alteration, disclosure, or access.

If you become aware of any actual or suspected data breach concerning personal data that could affect us or the individuals involved, you will promptly notify us without delay.

## 7. CHANGES TO THIS POLICY

Please be aware that this Privacy Policy is subject to periodic changes. However, we will not diminish your rights under this Policy without obtaining your explicit consent. Any modifications to the Policy will be promptly published on this page, and each version of the Policy will be clearly identified at the top of the page with its effective date.



## 8. CONTACT

If you have any questions or need further clarification regarding this policy update, please feel free to reach out to us at [support@bo-its.com](mailto:support@bo-its.com). Our dedicated team will be happy to assist you.