

## PRIVACY POLICY

This Privacy Policy (the “**Privacy Policy**”) describes how Royal Vision Capital DIFC Limited (the “**Client**”), located at Sheikh Zayed Road, Dubai, UAE (hereinafter “we” or “us”) collects and uses the personal information you (“**You**”) provide us with on our website <https://boosteroid.com/> or any of its subdomains or subpages (hereafter: “**Website**”). It also describes the choices available to You regarding the use of Your personal data and how You may access, update and delete this data.

If you use Our Site, applications and services, you agree to and accept each of the terms, conditions and provisions of this Privacy Policy and means that you give a consent according to the terms of Regulation (EU) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”).

### Collection of Personal Data

We receive and store any information You enter on our Website or give us in any other way. This includes information that can identify You ("personal information"), including Your first and last name, telephone number, postal and e-mail addresses, user name and password (if applicable). We may collect the following personal information from You if You choose to become a User and register with us:

- The personal data You provide us, such as: contact details, bank details, personal documents,
- Contact Information such as name, e-mail address or phone number;
- Unique Identifiers such as user name, account number or password (if applicable);
- IP address;
- Other data specified as personal data under the GDPR.

Please note that even if You do not register or become a user or in case You do not provide us with Your e-mail, we may automatically gather information from Your computer such as Your IP address, browser type, referring/exit pages, and operating system. This information does not include personally identifiable information about You.

### 3. General Operational Purposes

We may use information gathered from You for various purposes in order to:

- Ensure that content from our Website, applications is presented in the most effective manner for You and Your computer;
- Share information about our services;
- Notify You about changes to our services;
- Conduct statistical analysis;

- Develop and improve our Website, applications.

#### **4. Social Network Accounts**

We may offer You to log into our Website using social network accounts, such as Facebook and Google+. This service will authenticate Your identity and provide You with the option to share certain personal information with us such as Your name, e-mail address and photo to pre-populate Your profile.

#### **5. Our Personal Data Protection Principles**

We are strongly committed to protecting the privacy and security of Your personal data. We are a "Data controller" according to the terms of GDPR.

Our contacts:

Royal Vision Capital DIFC Limited (the "Client"), located at Sheikh Zayed Road, Dubai, UAE

e-mail: [support@boosteroid.com](mailto:support@boosteroid.com)

We will comply with data protection law, which says that personal data shall be:

- used lawfully, fairly and in a transparent way, applying the data minimization principle;
- collected only for valid purposes that we have clearly explained to You and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have revealed to You and limited only to those purposes;
- accurate at all times and kept up to date;
- kept only as long as necessary for the purposes we have revealed to You.
- kept securely.

#### **6. Use of Your Personal Data**

In general, we use personal data to:

- Conduct research and analysis;
- Improve our Website and marketing efforts;
- Send You confirmations for sign up;
- Send You newsletters;
- Respond to Your questions.

All personal data will be used lawfully, in accordance with the GDPR, and for the purposes of improvement of our online services in order to offer You our product. At all instances we will strive to collect only such data that are required for the

improvement of our services (data minimization principle), and will be stored until it serves the purposes for which it was collected according to this Privacy Policy.

Majority of the information enables us to comply with our legal obligations or fulfill our contractual arrangements with You and other parties and sharing this information may be necessary for us to provide our services.

We use the personal data that we collect for the following purposes:

To comply with our legal or regulatory obligations, we may use Your personal data (and if You do not provide this personal data we may not be able to provide our services to You):

- to confirm Your identity in order to create Your account and ensure that You are eligible to use the services provided on the Website applications;
- to conduct required know Your client (KYC) and anti-money laundering (AML) checks on You, and associated financial crime and fraud monitoring, in connection with transactions You may conduct through the Website, applications;
- to enable us to comply with our obligations, including transaction recording, other compliance responsibilities, and reporting to regulators and governmental authorities, if and when applicable.

We may use Your personal data:

- to process and administer payments in connection with the services provided on the Website, applications;
- to carry out our obligations under our contracts with You or others.

We have a legitimate interest in ensuring that the Website, applications and our services operate effectively, and to do this we may use Your personal data:

- to monitor, improve and administer the Website, applications and the services provided on the Website;
- to contact You to ensure customer satisfaction in respect of our role as a platform and service provider and assist You in getting the best value from our services;
- to respond to customer support or other enquiries requesting information. We may also intercept, record and/or monitor any communication(s) (including telephone calls or other electronic communications) between You and us. We may do so in order to resolve queries in the future and for the purposes of ensuring security, staff training and complying with our regulatory and legal responsibilities. In the case of communications by email You should note that, as emails are in general not encrypted (and may therefore be intercepted by third parties) and as the identity of the sender cannot be confirmed, You shall under NO circumstances provide Your security details, wallet address or similar by email.

We also have a legitimate interest in communicating with You and others, publicizing our business, and make sure that marketing, advertising, PR, and content we provide is effective, so we may use Your personal data:

- to enable us to conduct surveys and analysis, aggregate user profiles, and identify other potential customers;
- to advertise, publicize and promote our business, and to measure, understand, or improve the effectiveness of advertising we provide to You and others;
- in the case of individuals or businesses that have indicated an interest on the Website, applications to contact You to provide You with information about us or the services we offer and the campaigns on or Website, and on other selected products and services that we think may be of interest to You (unless You have or will ask us not to do so);
- to create and share informative content about our business or the industry in which we operate, including contacting You about reports we publish and new products we launch;
- in the case of journalists who are working in the sector in which we operate or related sectors, to provide You with news and updates about our business, and other relevant industry information.
- also, in certain other circumstances we may seek Your consent to use Your personal data. In such case we will ask You to confirm Your separate agreement to Your personal data being processed for a specific purpose, either through the Website or by another means.

## **7. Storage and Transfer of Your Personal Data, Security**

The personal data collected by us will be used by us. The data that we collect from You may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA and working for us or one of our suppliers. Such staff may be engaged in, among other things, the processing of Your details and the provision of support services. Any potential transfer of personal data outside the EEA will be done in accordance with Chapter V. of GDPR. By consenting to the terms of this Privacy Policy, You agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and in accordance with the GDPR. By providing us Your personal data, You agree that we may transfer such personal data to third parties. In such case we will ensure that Your rights will remain enforceable and effective legal remedies will be available to You following the transfer.

Any Personal Data that we collect will not be disclosed to any third parties, except under the following circumstances:

- we may disclose certain of Your personal data to third party service providers solely in the course of their provision of services to us and will take reasonable precautions to ensure that these service providers are obliged to keep Your

personal data secure and confidential, in compliance with relevant legal requirements. In some instances, Your personal data may be transferred outside the European Economic Area; if this is the case we will take steps to ensure that the transfer is protected by safeguards provided under EU and UK law, such as model contract clauses or the EU-US Privacy Shield;

- we may disclose certain of Your personal data if we, in good faith, believe that we are required to do so by law, regulation or the order of court or other legitimate government body or arbitration panel. This includes, among other things, any personal data that may be requested by HM Revenue & Customs and the Financial Conduct Authority;
- we may tell You in one of the agreements that You enter into on the Website that we will disclose certain of Your personal data in connection with a transaction You conduct through the Website. We may also tell You how we will use or disclose Your personal data when You provide information to us in certain other circumstances.

We endeavor to take all reasonable steps to protect Your personal data. We also require that all our employees undergo mandatory data protection training. However, we cannot guarantee the security of any personal data You disclose online. In using the Website, You accept the inherent security implications of engaging in transactions online over the internet, and You agree that You will not hold us responsible for any breach of security unless we have been grossly negligent or in willful default.

## **8. Rights of the User**

Every User of our Website has the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning the User or to object to processing as well as the right to data portability according to the terms of GDPR.

Rectification and erasure of data is free of charge.

If You wish to rectify inaccurate personal data concerning you, complete the incomplete personal data, or erase your personal data according to the terms of GDPR, please notify us on [support@boosteroid.com](mailto:support@boosteroid.com).

If You wish to object to direct marketing or other kind of communication we send to You, please notify us on [support@boosteroid.com](mailto:support@boosteroid.com) . To ensure that we respect Your request we may retain Your contact details on a suppression list.

Where we have processed information with Your consent then You may notify us on [support@boosteroid.com](mailto:support@boosteroid.com) to withdraw that consent at any time. Withdrawing Your consent will not affect the lawfulness of any processing we conducted prior to Your withdrawal, nor will it affect processing of Your information conducted in reliance on lawful processing grounds other than consent.

If You wish to see a copy of all of Your personal data that we hold, please notify us on [support@boosteroid.com](mailto:support@boosteroid.com). A request for a copy of Your personal data will generally be fulfilled free of charge, but we may charge a reasonable fee if the request is manifestly unfounded, excessive, or repetitive, or if You request multiple copies of the same information.

If You have concerns about how we collect and use Your data, please contact us on [support@boosteroid.com](mailto:support@boosteroid.com). If you are dissatisfied with our response, You may have the right to raise Your concern with the UK Information Commissioner's Office.

## **9. E-Mailing**

The e-mail addresses of our Users will only be used for sending the e-mail communication to the addressee. If You, as a User, want to unsubscribe from receiving e-mails, You can do so by contacting us at [support@boosteroid.com](mailto:support@boosteroid.com)

## **10. Changes to Our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on this webpage and, where appropriate, we will notify our Users about the amendments by e-mail.

## **11. The Right to Lodge a Complaint**

Each user has a right to file a complaint with the supervising authority, which is in UK the Information Commissioner's Office.

## **12. Contact Information**

If You require more information about our privacy statement, please contact us at [support@boosteroid.com](mailto:support@boosteroid.com)