



## PRIVACY POLICY

This Privacy Policy is issued by Nakito SA operating the business name FirstECN (hereinafter the “Company “, “we”, “us”, “our”, “FirstECN”), and it concerns the personal data we collect when visitors who are natural persons including current or potential customers of the Company or act as authorised representatives of legal entities (together, “you”, “your”, “visitors”) choose to use our services or access our website [www.firstecn.com](http://www.firstecn.com) (hereinafter the “Site”).

The Company values your privacy and is dedicated to managing your personal data with transparency and integrity. As a controller of your personal data, the Company decides on the purposes and methods of processing your data.

This Privacy Policy outlines the types of personal data we collect when you visit or use our Site, how we will use this data, the process of collection and transfer, and the duration of data retention. It also details your rights regarding our processing of your personal information and how you can exercise these rights. Please take the time to review and understand this policy.

Please note that this notice is addressed to customers and potential customers.

If you have any questions or concerns relating to the processing of personal data by FirstECN, you can use the contact information available on our website [www.firstecn.com](http://www.firstecn.com).

### 1. Definitions:

**'personal data'** refers to any information about you that can identify you, directly or indirectly.

**'processing'** encompasses any action or series of actions performed on personal data, including collection, recording, storage, use, disclosure, deletion, or destruction.

### 2. What Personal Data Do We Collect?

We collect personal data from you when you visit our website and through the completion of the online contact form available on our Site. Additionally, personal data is collected if you decide to contact the Company using the contact information provided on our Site. The



personal data we may ask you to provide or collect includes your full name (first name, surname, and middle name if available) and contact details (telephone, email).

In case you decide to open an account with the Company, we require you to complete the sign-up form with your first and last name, email address, and phone as well as to tick the non-mandatory fields indicating your preferences to receive support with the registration process via phone or to receive product updates, newsletters, etc. Further, the Company will require you to provide and therefore collect if you choose to do so your residential address including the country, city and zip code, your nationality and date of birth, your identity or passport or driving license number, information on your citizenship, date of birth, details on your financial status and occupational/employment status and background, tax residence and tax identification number, knowledge and experience in trading, credit or bank card details.

FirstECN, will also collect details on your risk tolerance and overall risk profile and any other information we may consider necessary in line with this policy. In line to the above, the Company will request a copy of your national identity card or passport or driving license, a copy of a recent utility bill/bank statement, or similar as evidence of your residential address.

If you are a corporate client, we are required to collect information related to the corporate entity such as corporate documents, information on directors or/and shareholders or other information that may be deemed necessary to ensure compliance with the applicable regulatory framework.

If you submit personal information belonging to another person, it will be treated as you are their representative, and you warrant that you have obtained the other person's consent to provide their information. The Company may collect information pertaining to your activity on the Website, including information or content that you have read, your session durations, the web pages you watched, services that were of interest to you, the location of the computer and the Internet Protocol (IP) address through which you had access to the Website and more. Additionally, the Company may collect or use the assistance of third parties to collect



and analyze anonymous, statistical or aggregative information related to your use of the Website.

It is your responsibility to provide complete, accurate, and correct information. You acknowledge and confirm that the personal information and details you provide are correct and accurate. While providing personal data to the Company is not mandatory under the applicable legal framework, providing false, incorrect, outdated, or partial information may impact or limit our ability to contact you or provide the requested service.

FirstECN does not provide any services to children, nor processes any personal data in relation to children, where 'children' are individuals who are under the age of eighteen (18).

### **3. How do we Use the Personal Data collected?**

The Company will treat all client information as confidential and will only use it for providing, administering, and improving services, conducting anti-money laundering and due diligence checks, and for research, statistical, and marketing purposes if explicit consent has been given. Information that is already publicly available or that the Company already possesses without a confidentiality obligation will not be considered confidential.

FirstECN, collects data for the account opening process and any relevant updates during the term of our relationship for due diligence purposes. The Company will collect data for the purposes of verifying the client's identity, address and source of funds, constructing an economic profile and monitoring your account for the purposes of complying with applicable regulations and standards including the provisions of anti-money laundering and terrorism financing. Moreover, we use personal data to set up and administer your trading account and to provide technical and customer support.

The collected information helps in the development and improvement of the products and services offered on our Site. This data assist in enhancing the Site's content and providing more personalised content, services, and products.



Personal data may also be used to contact you, either by the Company or by someone acting on our behalf, via email or phone. These contacts will provide information related to our services and products that may be of interest to you or your business. Additionally, personal data will be used for research surveys and other similar activities related to our products and services.

We will only use your personal data to promote our products and services if we have your explicit consent or, in certain cases if we believe it is in our legitimate interest to do so. To opt out of receiving marketing information from us you can contact us at any time at [support@firstecn.com](mailto:support@firstecn.com).

All the information we collect assists us with client profiling/segmentation, and statistical analysis. Collected data may be used for promotions and other marketing services and products subject to your exercise of the opt-out right. Analytical and statistical information developed via the collection of personal data may be provided to third parties. This information will not identify you personally. The collected information used by the Company for these purposes will be mainly statistical information and will not identify you personally.

Your personal data will be used for the purposes specified in this Policy or our Terms and Conditions available on our website.

#### **4. Do we transfer Personal Data to third parties?**

In the course of our business and for legitimate business purposes, your personal data may be shared with some or all of the categories below:

- a) Third Service Providers including auditors, lawyers, consultants/advisors third parties who assist us with the effective provision of our services by offering technological expertise, solutions, and support, and other service providers who may engage with us to assist us with our Site maintenance and enhancement. We may also transfer your personal data with service providers to facilitate our email communications with you;



- b) Group Entities (companies that we control, control us, or are under common control with us, whether directly or indirectly);
- c) In any case of dispute, or legal proceeding of any kind involving you with respect to the Site we may share your personal information with attorneys, courts, and any other party relevant to such proceedings;
- d) With government bodies, component and law enforcement authorities and organisations in case we were requested in the course of an investigation;
- e) We may share your personal information with categories of persons in c) and d) if we identify that you abused your rights to use the Site, or violated any applicable law, if it is necessary or justified;

In any case, other than the above, your personal information will be shared with others only if you provide your explicit prior consent.

#### **5. Transfer of data outside EU:**

We may process your personal data in countries where the applicable standards and laws may be of a lower protection than those of your country. In this respect, we will take measures to ensure that your personal data receives an adequate level of protection. In case you reside within the European Union and your personal data is transferred to a service provider for processing in any country outside the EEA, that is not recognized by the EU Commission as providing an adequate level of protection for personal data, we make efforts to ensure that there are in place appropriate safeguards.

#### **6. Our Lawful Basis:**

We may process your personal data for one or more lawful bases of processing (“Lawful Basis”) depending on the specific purpose for which we are using your data. The Lawful Basis are the following:

- ❖ to perform our contractual obligations towards you;
- ❖ to be compliant with applicable legal and regulatory requirements;
- ❖ to pursue our legitimate interests.



Where our use of your personal information does not fall under one of the abovementioned Lawful Bases, we will require you to provide your consent. Such consent shall be freely given by you and you will have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists

#### **7. Retention of Personal Data:**

The Company retains your personal data for as long as necessary to fulfill the purpose for which it was collected. In determining data retention periods, we consider local laws, contractual obligations, and the expectations and requirements of our clients. When personal data is no longer needed, we securely delete or destroy it. The obligation to delete personal data can be triggered by various events (please refer to the section below).

#### **8. Your Rights:**

At any time, you have the right to request FirstECN to access, request a copy, delete, change, correct inaccurate or incomplete data, or update your personal data. Moreover, you may ask us to cease the usage of your personal data or even request us to stop processing your data to third parties. The Company will process your request immediately and subject to any legal obligation.

Additionally, you have the right, under certain conditions, to request that we restrict the processing of your personal data and to have the data we hold about you transferred to another organization. When these conditions apply, the Company will restrict the processing of your personal data and transfer your personal data to the specified organisation accordingly.

Besides the above, you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing, or 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. In some cases, we may demonstrate that we have



compelling legitimate grounds to process your information which override your rights and freedoms.

Where you have provided your consent to process your personal data you have the right to withdraw your consent. Withdrawing your consent does not impact the lawfulness of the prior personal data processing.

Further to the above, you have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of your personal data infringes the applicable regulation.

To exercise any of the aforementioned rights, you can send your request to [support@firsttecn.com](mailto:support@firsttecn.com).

The Company may rectify, replenish, or remove incomplete or inaccurate information, at any time and at its own discretion.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

#### **9. Cookies and Other Trackers:**

We use various types of cookies and other types of web trackers, which enable us to administer and operate the Website. Our cookies and trackers are used mainly to collect statistical information about your use of the Website. We use cookies for Website analytics purposes, as explained above. You always have the option to opt out whether you already accepted cookies or not. In this respect, you can block, delete, or adjust the cookies settings on your browser.

Please refer to our Cookies Policy for more information.



#### 10. Policy Updates:

From time to time, the Company may change the terms of this Policy. You agree to be bound by all changes made in the terms of this policy. Continuing to use the Website will indicate your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Website. In case of material amendments, we will notify you accordingly.

#### 11. Contact Us:

You may contact us for more information or to submit your enquiry regarding this Policy at [support@firsttecn.com](mailto:support@firsttecn.com) or by completing our online contact form available on our website.

If you wish to complain about how we have handled your personal data, please contact us directly at the email address mentioned above. If you are not satisfied with our response or believe we are not collecting or processing your personal data in accordance with the laws, you can lodge a complaint with the relevant data protection authority.