

## **1. OUR COMMITMENT TO YOUR PRIVACY**

This Privacy Policy tells you what personally identifiable information SIA “Welfio”, registration No. 40203368763, (“**Welfio**”, or “**Welfio.com**”, or “**we**”, or “**us**”, or “**our**”) may collect from you, how may process your personally identifiable information and your rights to obtain, modify and/or delete any personally identifiable information have collected from you.

## **2. COOKIES**

Like many other websites, we use “Cookies.” A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to identify the areas of our Website that you have visited. We also use cookies to enhance your online experience by eliminating the need to log in multiple times for specific content. Finally, we may use Cookies to personalize the content that you see on our Website or to customize marketing and other information we provide to you.

## **3. DO NOT TRACK SETTINGS**

Some web browsers have settings that enable you to request that Welfio.com does not track your movement within our website. Welfio.com does not obey such settings when transmitted to and detected by Welfio.com. However, this does not change our compliance in any other way with our Privacy Policy.

## **4. OTHER AUTOMATICALLY GATHERED INFORMATION**

We may automatically record information when you visit Welfio.com, including the URL, IP address, browser type and language, and the date and time of your visit. We use this information to analyze trends among our users to help improve Welfio.com or customize communications and information that you receive from us. If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to Welfio.com.

## **5. INFORMATION WE COLLECT**

5.1 Welfio.com may process the following personal data of the Clients:

1. Identification data - Name, e-mail.
2. Contact details of the - Client e-mail address.
3. Contact information in emergency situations - Client’s name, surname, e-mail address.
4. Settlement-related data - Client’s bank account number, bank name, amount and time of mutual settlements.
5. Information transmitted with consent - Data transmitted in accordance with the Consent given by the Client additionally or included in the contract.
6. Additional Data from Google account - Name, email address, language preference, profile picture.

## **6. HOW WE USE YOUR INFORMATION**

6.1. Our primary purpose in collecting and using your personal information is to provide you with a safe, efficient, and customized experience.

6.2. Aggregated Non-Personal Information: We may share aggregated non-personal information with third parties.

6.3 For other specific purposes, whereof the Client will be informed at the time of provision of the relevant data to Welfio.com.

6.4 To provide information to public institutions: to provide information to the state authorities and emergency response institutions in the cases and to the extent stipulated in the regulatory enactments.

6.5. We do not sell or rent your personal information to third parties without your explicit consent.

6.6 To establish, exercise and protect the right of claim: to establish, exercise, protect and cede the right of claim, fulfilling a contract, or as requested by the Client to take measures prior to entering into a contract or to perform a legal duty, or in the legitimate interests of Welfio.com to exercise the right of claim.

6.7 To protect Welfio.com and/or Client's interests: to protect the Client's and/or Welfio.com interests; to provide evidence for business transactions or other business communication (storage of e-mails, storage of submitted documents, etc.); on the basis of the fulfillment of a contract: in the legitimate interests of Welfio.com to avoid, limit and investigate unfair or illegal use of or intentional damage to Welfio.com brand, services, goods; to conduct internal training or to ensure the quality of services; to ensure the safety of Welfio.com and/or the Client, to protect the life and health of the Client and/or his representatives, and other rights of Welfio.com and the Client (visual records), in accordance with the legitimate interests of Welfio.com, to protect the Client, Welfio.com employees, and visitors.

## **7. OUR DISCLOSURE OF YOUR INFORMATION**

7.1. We may disclose your personal information to respond to legal requirements, enforce our policies, or protect anyone's rights, property or safety. If we do disclose your information for any of these reasons, we will do it in accordance with applicable laws and regulations.

7.2. We may also share your personal information with:

7.2.1. Third party service providers necessary to provide the service (e.g., data hosting providers), in which case we require that they comply with our Privacy Policy and take appropriate confidentiality and security measures.

7.2.2. Other third parties whom you explicitly ask us to send your information to 7.2.3. Law enforcement or other government officials, in response to a verified request relating to a criminal investigation or alleged illegal activity. In such event, we will disclose information that is relevant to the investigation.

7.3. Welfio Website may contain affiliate links to various investment platforms. Upon your signup to a particular platform via the link provided, Welfio might receive a commission. Importantly, the commissions paid to Welfio do not come at any cost to you! On the contrary, in many cases, if you sign up to a platform via Welfio link, you can receive a bonus that will support your investments and ensure better returns.

Please note that the commissions offered and paid to Welfio by investment platforms, in no way affect or bias our assessment of the investment opportunities offered by the particular platforms. The commissions are simply a tool that allows Welfio to develop the product further and bring you new and useful features, allowing you to make more informed investments.

## **8. OBTAINING, CHANGING OR DELETING YOUR INFORMATION**

### **8.1 Access to your personal information**

To obtain a copy of all information we maintain about you, you may send us a request using the contact information at the end of this Policy. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### **8.2 Remove or Change your Information**

If you wish us to remove or change personally identifiable information that you have provided us you may contact us at the contact information at the end of this Policy.

## **9. RETENTION PERIOD FOR PERSONAL DATA**

Except as otherwise mentioned in this Policy, we keep your personally identifiable information only for as long as required by us:

- to provide you with the products you have requested, or otherwise to perform or enforce a contract between us;
- to continue to provide the best possible user experience to visitors who return to our website to collect information;
- to comply with other law, including for any period demanded by tax authorities; or
- to support a claim or defense in any court or in any legal, regulatory or administrative proceeding.

## **10. LIMITATION OF LIABILITY**

You assume the sole risk of transmitting your information as it relates to the use of Welfio.com, and for any data corruptions, intentional interceptions, intrusions or unauthorized access to information, or of any delays, interruptions to or failures preventing the use Welfio.com.

## **11. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to change this privacy policy at any time. If Welfio.com decides to change this Privacy Policy, we will post those changes on Welfio.com so our users are always aware of what information we collect, use, and disclose. In all cases, your continued use of Welfio.com after any change to this Privacy Policy will constitute your acceptance of such change.