

# Renaissance Capital

**RENAISSANCE SECURITIES (CYPRUS) LIMITED**

**PRIVACY NOTICE FOR CLIENTS**

Last Update: 2 October 2018

## Privacy Notice

This Privacy Notice describes how Renaissance Securities (Cyprus) Limited (the “**Company**”, “**RESEC**”, “**we**”, “**our**” or “**us**”) collects and processes personal data for the provision of investment products and services, how we use and protect this information, and your individual rights in relation to this information. This Privacy Notice applies to all personal data that RESEC collects about clients and website users. Personal data is information, or a combination of information that could reasonably allow an individual to be identified.

This Privacy Notice describes the arrangements that RESEC has in place to comply with its obligations under the General Data Protection Regulation (“**GDPR**”) and the equivalent legislation in the Republic of Cyprus and our commitment to maintain the privacy of every current, former and prospective client and website user.

RESEC is the Data Controller (as such term is defined in the GDPR) for the purposes of this Privacy Notice.

We are a subsidiary of Renaissance Financial Holdings Limited, which together with all its other subsidiaries trades under the global brand name of “Renaissance Capital” (also referred to herein as “**Group**”). We describe in this Privacy Notice how personal data may be shared within Renaissance Capital.

## Why does RESEC collect personal data and from who such personal data is collected?

RESEC holds a license from the Cyprus Securities and Exchange Commission (“**CySEC**”) (number 053/04 dated 22 December 2004), which permits the Company to operate as a Cyprus Investment Services Company and to provide investment and ancillary services in relation to specific financial instruments (the “**Services**”).

RESEC is subject to legislation and regulations which aim to ensure the legitimate, orderly, fair and transparent operation of the financial markets, as further set out herein.

We may collect and process personal data relating to individuals using our Services as well as individuals (hereinafter referred to also as “related parties”) associated with legal entity clients and counterparties (collectively “**Clients**”), including but not limited to:

- individual directors, company secretaries or other equivalent individual office holders;
- nominee, intermediate and ultimate beneficial owners of the Clients;
- any employees, contractors, representatives, officers or agents of the Clients;
- legal representatives and other individuals authorised to act on behalf of the Clients;
- individuals associated with the directors and beneficial owners of the Clients’ business; and
- guarantors and third-party security providers.

We will also collect personal data from persons using our Research services and portal, and from visitors to our website.

## What RESEC uses personal data for and on what basis

RESEC must have a legal basis to process Clients’ and related parties’ personal data. We set out in the table below the key purposes for which RESEC uses personal data about Clients and their related parties and the legal basis for doing so. Where RESEC is relying on a legitimate interest, this is also described below:

What RESEC uses your personal data for	The legal basis for doing so
Conducting ‘Know Your Customer’ activities, including anti-money laundering and risk screening checks (including on related parties) and for the prevention, detection and investigation of crimes, including money-laundering, terrorist financing, fraud, corruption, sanctions and tax evasion both at the initial onboarding stage as well as at any other time intervals required by law or our internal policy	<ul style="list-style-type: none"> <li>• The EU Anti Money Laundering Directive (as in force from time to time) and equivalent legislation of the Republic of Cyprus, circulars and directives of the CySEC as well as Sanctions Notices issued by relevant international authorities and organisations</li> </ul>

<p>To the extent necessary to administer and operate the Services in accordance with any agreements and the relevant legislation and regulations and to pursue legitimate interests, in particular in the course of the operational support and development of our business, including to evaluate customer service, efficiency and cost, and for risk management purposes</p>	<ul style="list-style-type: none"> <li>• Where relevant legislation such as the Investment Services and Activities and Regulated Markets Law of 2017 (transposing the Markets in Financial Instruments Directive II (“MIFID II”) into Cyprus legislation), and the Markets in Financial Instruments regulation (“MIFIR”) require this</li> <li>• Where it is in our legitimate interests to ensure that our Clients’ accounts are well managed, so that you are provided with a high standard of service, to protect our Clients and our business interests</li> </ul>
<p>Trade, transaction and position reporting, trade, transaction and communications monitoring, internal and external audit monitoring, complaints management</p>	<ul style="list-style-type: none"> <li>• Where relevant legislation such as the Investment Services and Activities and Regulated Markets Law of 2017, MIFID II, MIFIR and relevant Market Abuse legislation, directives and regulations require this</li> <li>• Where it is in RESEC’s legitimate interests to develop and implement systems, processes and procedures (including internal control and audit mechanisms) which protect its business interests and / or provide its Clients with a high standard of service or where it is required for the purposes of analysing, evaluating and responding to a complaint you may have lodged with us</li> </ul>
<p>Complying with our legal and regulatory obligations to which we are subject to and cooperating with regulators and other law enforcement agencies with jurisdiction over RESEC or Renaissance Capital</p>	<ul style="list-style-type: none"> <li>• Where relevant laws, regulations, Sanctions Notices and directives require this</li> </ul>
<p>To exercise and defend our legal rights or the legal rights of our holding company or our affiliates in the Group (such as for example to detect, prevent and respond to fraud or other violations of law, for legal and dispute management purposes and for debt collection and recovery purposes) or for complying with court orders relevant to us or associated with our holding company or our affiliates in the Group</p>	<ul style="list-style-type: none"> <li>• Where the law requires this or where it is in our legitimate interests to do so</li> </ul>
<p>For responding to yours or your related party’s request for information either on an ad-hoc basis or as stipulated in your legal agreement with us</p>	<ul style="list-style-type: none"> <li>• As explicitly requested and / or authorised by you or by the persons acting on your behalf</li> </ul>
<p>Communicating with the Client and related parties from time to time about our Services and other communications such as Research briefing, Events invitations etc</p>	<ul style="list-style-type: none"> <li>• Where it is in our legitimate interests to provide information about our business and Services that we reasonably consider would be of interest or of information to our Clients</li> </ul>
<p>Providing services requested by the Client, for user authentication, management and administration of our Website and trading platforms (including for Cyber – crime and unauthorised use access), management, administration, monitoring and reporting to develop and improve our Services</p>	<ul style="list-style-type: none"> <li>• Where it is in our legitimate interests to ensure that our Services are well managed, to protect and safeguard our business interests and assets and the interests and assets of our Clients</li> </ul>

## How we collect personal data

We may collect this personal data directly from the Client, from publicly available sources or third parties providing services to us. This includes (without limitation) professional social media, market data suppliers and screening tool suppliers.

## *Information you give us*

You may give us information about you by filling in forms or by corresponding with us by phone, email, in person, or otherwise.

## *Information we collect from you*

We collect the personal information of our Clients and Research clients and visitors to our website to maintain our contractual relationship and to adhere and ensure adherence to our regulatory requirements set by CySEC and to comply with all other legal and regulatory obligations.

We may collect data from you in a number of ways, including without limitation the following:

- when we complete due diligence on you, including the information that you have provided to us directly or indirectly via the information that you have manifestly made publicly available (including without limitation professional social media profiles, such as LinkedIn);
- when we enter into a contract with you and during the provision of Services (to the extent required by applicable Laws and regulations);
- from third parties.

We may collect information about you when you use our web-site ("the Site") or when you use other services offered by Renaissance Capital in the following ways:

- If you register to use the password-protected portions of our Site, including but not limited to Research Portal, Cabinet or Conference, we will ask you to provide us with certain information about yourself. We use such information to verify your identity and eligibility to receive certain services.

## What information we collect

We set out below a list of information we may collect from you and / or your related parties. The information that we may collect includes, but is not limited to, the following:

- **Personal details** (e.g. your name, title, date of birth, gender, copies of passport, driving license, CV and copies of educational / professional certificates and similar documents on professional experience, current and past employment details, any disciplinary action taken or threatened against you by a professional or regulatory body etc);
- **Contact details** (e.g. phone or mobile number, postal address, email address, country of residence, Bloomberg address);
- **Client related details** (e.g. relationship with the Client (if you are presented as a related party), business information, information about any shareholdings and directorships, business contact details);
- **Financial details** (e.g. information about your wealth and its sources, annual income and expenses, your knowledge of trading in financial instruments, including the value and frequency of such trading, financial and banking statements, tax statements, information from credit and fraud prevention agencies etc);
- **Transactional details** (e.g. information about Services used, trade orders whether or not executed), transactions carried out, portfolio composition and values, passwords for trading platforms, trading history and patterns, complaints etc);
- If the visitor of our Site had ever used his/her credentials to access our Site, when he/she visits the Site again (any of its resources or web-page), his/her device and browser may automatically disclose certain information (such as browser type and settings, IP address, cookies<sup>1</sup>, activity logs, geolocation data), some of which may constitute personal data.

Some of the information that we collect may comprise sensitive personal data. For example, the due diligence checks we may undertake in the process of onboarding you as a Client may reveal information about criminal conviction or offenses or about your (or your related parties') political standing or opinions (including if you are a Politically Exposed Person as such term is defined in the Anti Money Laundering legislation). In addition, if incorrect information is provided or fraud or market abuse is suspected we will record this. We may also pass this information to CySEC or financial crime prevention agencies where it may be accessed by law enforcement agencies in Cyprus, the European Union or other jurisdictions. Where we process such sensitive personal data, it will usually be on the basis that it is necessary for reasons of public interest or to adhere to our legal and regulatory obligations and to

---

<sup>1</sup> Our Cookie Policy can be found here: <http://www.rencap.com/InfoDisclosure/CookiePolicy/> .

establish, exercise or defend any legal claims. We will also carry out the data processing in accordance with applicable laws.

## Data relating to criminal convictions & offences

We may also collect and store personal data relating to your credit worthiness, criminal convictions and offences. This data is only processed where it is necessary for the purposes of:

- Our obligations under the Anti Money Laundering and Sanctions legislation and regulations and the prevention or detection of an unlawful act and / or is necessary for reasons of substantial public interest; or
- establishing, exercising or defending our legal rights.

## Recording of communication

We may, in our sole discretion, record all telephone conversations (and all other means of communication, including (but not limited to) email and instant messaging), including those that relate to the reception, transmission and execution of your orders (including with respect to your use of direct market or other online trading platforms), even if those conversations or communications do not result in the conclusion of transactions or in the provision of Services. We may do this for quality control and security purposes and in order to comply (and monitor compliance with) our legal obligation to uphold orderly, fair and transparent financial markets as well as with all other applicable regulations, agreements and any policies and procedures that we apply.

We may use such recordings and transcripts for any purpose that we deem necessary or desirable, including as evidence by us in any dispute between us and any other party. We will retain records in accordance with our operational procedures which may change from time to time in our absolute discretion.

## Data disclosure & transfers

RESEC is a subsidiary of Renaissance Financial Holdings Limited (“**RFHL**”) incorporated in Bermuda. RFHL operates a number of subsidiaries in a number of jurisdictions which are engaged in the provision of investment services and which altogether are commercially (and also for the purposes of this Privacy Notice) referred to as “**Renaissance Capital**” or “**Group**”. These include subsidiaries in the Russian Federation, the United Kingdom, South Africa, Nigeria, Kenya, UAE, Egypt and the USA.

As we operate internationally, we need to share information with other affiliates in Renaissance Capital and external vendors, in order to conduct our business, support our Clients, and also for where we may outsource operational functions.

Where a global service is provided to our Clients, personal data can be accessed from the offices of the other Renaissance Capital affiliates noted above, where this is necessary for the performance of a transaction with / for the Client, or for compliance with regulatory or legal requirements imposed on us.

In the course of providing the Services, we may also share with or disclose personal data we hold to:

- professional advisors both in and outside the EU (including lawyers, accountants and auditors) who may need to advise us on specific matters relating to you and the Services we provide to you;
- legal and regulatory authorities such as the CySEC, and
- third parties such as settlement agents, overseas banks or exchanges or clearing houses to whom we disclose information in the course of providing the Services.

These third parties will also be data controllers of your personal data and your personal information will be processed in accordance with the third party’s privacy policy.

As part of the reporting requirements of / to our Regulator (CySEC), we are obliged to provide your personal data for certain categories of individuals associated with our Clients to a “market data processor” for onward transmission to the CySEC and from then on to the European Securities and Markets Authority. Such transmissions (whether they take place through a market data processor or direct by us) take place amongst others as part of the transaction

reporting regime under MiFID II for monitoring market abuse. We only provide this information where it is necessary for compliance with our legal obligations.

We may also disclose your information to third parties where it is in our legitimate interest to do so including without limitation if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

As noted above, and given the matrix organisational structure of Renaissance Capital, it may be necessary to transfer your details to members of our Group located in countries that may not offer equivalent data protection or privacy laws to those in Cyprus or the EU.

Regardless of where your information is transferred, we shall ensure that your information is safe and shall take all steps reasonably necessary to put in place appropriate safeguards to ensure that your information is treated securely and in accordance with this Privacy Notice and applicable law. These safeguards will include the use of contractual terms that meet with the requirements of the European Union. Details regarding these safeguards can be obtained from the Company via the email address [DataProtection@rencap.com](mailto:DataProtection@rencap.com).

## Policies and Procedures

We implement a number of additional policies in relation to data privacy and data security, such as Data Protection Policy, Cookie Policy, Informational Security Policy, as updated from time to time.

## Security of your information

We are committed to ensuring that your information is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

All information you provide to us electronically is stored on our secure servers within Cyprus or at any other Renaissance Capital affiliate to where (certain limited information as identified above) is transmitted as noted above. All data is stored for back up purposes on Microsoft Cloud.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our IT system, you are responsible for keeping this password confidential. We ask you not to share your passwords with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your data transmitted to or stored on our IT system and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## How long we keep your information

We will keep your data for as long as necessary to fulfil the purposes described in this Privacy Notice or in the terms of our business relationship or contractual obligations with you, or for as long as we are required by law. This is generally to be expected no less than 5 years from the date of termination of your relationship with us.

## Your rights

### *Access to your information and updating your information*

- You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal information which we are processing and hold about you ("**data subject access request**"). For any further copies which you may request, we may charge a reasonable fee based on administrative costs.

- You also have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another data controller (“**data portability**”).
- We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.
- Requests can be sent in a free text format via email [DataProtection@rencap.com](mailto:DataProtection@rencap.com).

#### *Right to object to processing in certain circumstances*

You also have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information which is based on our legitimate interests. Where you object on such grounds, we shall no longer process your personal information unless:

- the processing is nevertheless necessary for the performance of our contractual relationship; or
- the processing is necessary for the establishment, exercise or defense of legal claims; or
- we have a legal or regulatory obligation for which the processing of the information is necessary; or
- we can demonstrate that our legitimate interest is sufficiently compelling to override your fundamental rights and freedoms.

You also have the right to **request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing as noted above. Generally, we will aim to adhere to your request, except for the reasons noted above.

#### *Your other rights*

You also have the right to request that we rectify your information if it is inaccurate or incomplete or to transfer your data to another party.

In certain limited circumstances, you have the right to request the erasure of your personal information (“**right to be forgotten**”).

## Exercise your rights

You can exercise any of your rights as described in this Privacy Notice and under data protection laws by contacting us via the email address [DataProtection@rencap.com](mailto:DataProtection@rencap.com).

Save as described in this Privacy Notice or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

## Complaints

We are committed to working with you to obtain a fair resolution of any bona fide concern, grievance or complaint about our data privacy management procedures and practices.

You also have the right to complain to the Data Commissioner of the Republic of Cyprus about our data processing activities. The contact details are as follows:

Address: 1 Iasonos Street, 1082, Nicosia

Telephone: + 357 22 818456

Fax: + 357 22 304565

E mail: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

Web site: <http://www.dataprotection.gov.cy>

## Privacy Notice Updates

This Privacy Notice may be amended by the Company at any time in its sole and absolute discretion. Any changes which may be made to this Privacy Notice in the future will be notified to you by email and/or by publication on our Site.

This Privacy Notice was last updated on 2 October 2018.