



**EMXPRO LIMITED**  
**Privacy Policy**

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This notice describes how EMXPRO Limited (“EMPEROR Xpro”) uses personal data. It outlines EMPEROR Xpro’s data protection obligations and your data protection rights.

This policy applies to “personal data” meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

EMPEROR Xpro needs to use your personal data to provide its services to you, so this notice outlines the following points about the processing of your personal data:

- which data items are used, how they are used and who they are shared with;
- why this is done and the lawful basis;
- your rights and EMPEROR Xpro’s obligations.

## **Why EMPEROR Xpro needs to process personal data**

Your Data are collected to effectively and properly manage your Account(s) with us. Data is stored for specific purposes and only data that is relevant to that purpose will be stored. We will use the Data for several different purposes, including;

- a. to provide you with information that you request from us (including through our website) or which we feel may interest you, where you have consented to be contacted for such purposes;
- b. to make our procedures more efficient, to implement security measures and to combat fraud and other crimes;
- c. to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting and
- d. to notify you about changes to our business

If at any time you wish to be removed from marketing mailing lists or for any limits to be applied with respect to marketing materials received by you, please let us know. You can do this by e-mailing us. Contact details are available on our contact page.

## **Data collection**

EMPEROR Xpro may collect data:

- a. when you or an agent of yours contacts EMPEROR Xpro in relation to our business;
- b. when you complete documents or forms during the course of business with EMPEROR Xpro;
- c. from Service Providers and other third parties that assist us in conducting business;
- d. when you contact EMPEROR Xpro through e-mail and/or hotlines; and
- e. when you use the EMPEROR Xpro website.

## **Data storage**

EMPEROR Xpro stores your data on physical and electronic media. Data is safeguarded by EMPEROR Xpro and its Service Providers by maintaining physical and electronic security controls that are designed to comply with applicable legal standards.

The Data that is collected or held in relation to you may be transferred to, and stored at, a destination outside the company registered address, St Vincent and the Grenadines (“St. Vincent”). It may also be processed by staff operating outside St. Vincent who works for us or for one of our Service Providers. In some cases, the laws of the destination country/jurisdiction may not provide the same level of data protection as St. Vincent. However, all Data wherever they are held by EMPEROR Xpro will be afforded a high level of protection against any unauthorised or accidental disclosure, access or deletion. By submitting your Data you agree to this transfer, storing or processing.

Unfortunately, the transmission of information via the internet is not completely secure. Although EMPEROR Xpro will do its best to protect your Data, we cannot guarantee the security of your Data transmitted electronically. Any such transmission is at your own risk.

### **Types of data that might be collected**

During EMPEROR Xpro’s relationship with you EMPEROR Xpro will collect and process Data about you, including:

- a. information which individuals and entities provide when contacting us (including through using this website) (such as their names, postal addresses, telephone numbers, identification documents and e-mail addresses);
- b. corporate information;
- c. where permitted or required by regulators or the law, special categories of personal information such as health information or information relating to criminal convictions or offences;

### **Data sharing**

EMPEROR Xpro uses Service Providers to conduct aspects of its business, so information may be disclosed to them and their affiliates Data that you have provided in order to fulfil the purposes for which the Data is held. These Service Providers may disclose such Data to each other and to each other’s affiliates in order to achieve the same purposes.

EMPEROR Xpro and its Service Providers may also be required to disclose your Data to governmental agencies, self-regulatory organisations, industry associations and similar bodies in order to fulfil legal and regulatory requirements. In addition, the laws of certain countries and states give people involved in lawsuits and other legal proceedings the right under certain circumstances to obtain information from EMPEROR Xpro and its Service Providers, including your Data. EMPEROR Xpro and its Service Providers will comply with these laws to the extent required.

EMPEROR Xpro will not sell your Data to any third party. Wherever possible, Service Providers are required to enter into confidentiality agreements that prohibit them from selling or improperly using your Data.

### **Data retention**

EMPEROR Xpro will retain your personal information for a period of up to seven (7) years following the point where the business relationship has ceased.

It may be necessary to retain your personal information beyond this period depending on additional legal/regulatory obligations. Thereafter, EMPEROR Xpro will refrain from collecting any further personal information on you and shall take appropriate steps to dispose of any records containing your personal information to the extent this is operationally feasible and proportionate.

## Cookies

EMPEROR Xpro does use cookies on its website.  
Further details are available in our cookie policy.

## Lawful basis for processing

EMPEROR Xpro assesses all personal data that is collected or stored to ensure that there is a legal basis for each type of data. Given that EMPEROR Xpro is an authorised firm in St. Vincent, the majority of lawful basis for St. Vincent's processing is to meet its legal obligations or to fulfil its obligations to you under contract (contract basis).

Other lawful basis may be used where EMPEROR Xpro assesses this is necessary and appropriate.

## Data subject rights

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information (in an easily readable form);
- Right to rectify your personal information;
- Right to restrict the use of your personal information (in certain specific circumstances);
- Right to request that your personal information is erased (in certain specific circumstances). Please note that the right for your data to be erased (the “right to be forgotten”) that applies in some contexts under the General Data Protection Regulation (GDPR) is not likely to be applicable to most, if not all, of the personal information you provide to EMPEROR Xpro, given the specific nature of the purposes for which EMPEROR Xpro uses the data, as described above;
- Right to object to processing of your personal information (in certain specific circumstances);
- Right to data portability (in certain specific circumstances);
- Right to withdraw consent (in certain specific circumstances); and
- Right to receive information regarding any entities we disclose your data to.

Where EMPEROR Xpro or its Service Provider(s) requires your personal information to comply with AML or other legal requirements, failure to provide this information means EMPEROR Xpro will not be able to have any business dealings with you.

EMPEROR Xpro shall notify you of any personal information breach affecting you that is likely to result in a high risk to your rights and freedoms.

## Changes to this notice

EMPEROR Xpro will need to update its privacy policy in response to regulatory requirements or changes to its business. The latest notice will always be available on

the EMPEROR Xpro website.

### **How to contact EMPEROR Xpro**

Data subjects can make a complaint to the supervisory authority including the Member State in which they reside or work or the place of the alleged infringement.

If you have any questions or concerns about personal data or this privacy policy or you wish to make a complaint about how EMPEROR Xpro has processed your personal data, please contact EMPEROR Xpro through e-mail at [cs@EMPEROR Xpro.com](mailto:cs@EMPEROR Xpro.com).