

Rockwall Investments Privacy Policy



§ 1 General information

1. Privacy Policy specifies terms and conditions of protecting personal data of the user of <https://rockwall.investments> and other applications, plugs and services connected to this.
2. The data controller is a company of Rockwall Ltd., registered in Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marskall Islands MH 96960 (P.O. Box 1405, Majuro Marshall Islands) company number 92066, which pursuant to Art. 27 of the European Parliament and Council regulation (EU) 2016/679 dated 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR) appointed a representation in the European Union: a company of Rokbull LTD C220 d 89 Bickersteth Road, Trident Business Center, London, United Kingdom, SW 17 9SH, company number 11640145.

§ 2 Definitions

1. **Personal data** - any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
2. **Data controller** - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
3. **Processing** - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

§ 3 Legal Basis

1. The basis for data processing of the user is:
 - a. in case of using the services available within the website by the user - processing of personal data is necessary to provide the services;
 - b. in case of data processing for the marketing purposes, profiling or receiving commercial information - the user's consent as a person, who provides the data.

2. During the registration process of the user account within the website, the user gives a consent to collect and process personal data by the controller in the way and purposes specified in the consent and herein. Providing the user's personal information and consent to their processing is required to perform most of the services. The user is responsible for providing false personal data.

§ 4 Registration

1. The Registration of the User Account within the Website requires filling the form including the following personal data:
 - a. company name;
 - b. registration number (tax, VAT number);
 - c. name;
 - d. surname;
 - e. e-mail address;
 - f. phone number.
2. During the registration the user specifies own user name and a password, which are used to log in to the website.

§ 5 What kind of personal data do we collect?

1. Within the user account, the controller collects additionally the following data concerning the user, which are provided after the registration to the website optionally:
 - a. address(es);
 - b. alternative e-mail addresses or phone number;
 - c. bank account numbers;
 - d. Personal Identification Number PESEL;
 - e. photos added by the user;
 - f. languages used by the user;
 - g. data included in the identity card, passport or other document provided by the user in order to confirm own identity.
2. It is required to provide other personal data in justified circumstances, particularly, in the event of providing a justified request to the service provider for the sharing data with the authorities and the user shall be informed each time about that, and also if it is required to execute a payment.
 - a. other address(es);
 - b. alternative e-mail addresses or phone number;
 - c. bank account numbers;
 - d. Personal Identification Number PESEL;
 - e. photos added by the user;
 - f. languages used by the user;
 - g. data included in the identity card, passport or other document provided by the user in order to confirm own identity.

§ 6 Profiling of collected data

1. Processing personal data by the controller includes profiling the user of the website according to their behaviour, interests, payment credibility and purchase preferences. Profiling aims at satisfying user's needs and assuring accuracy of selection of suggested services to the user. Based on profiling, the controller may convey contents to the user from time to time, which potentially may interest them, in particular additional information, marketing content, proposals, and surveys.
2. The controller may process data describing the way of using the website by the user and provided services, in particular, such as signs identifying the end of the telecommunications network or tele-informatic system used by the user, information about the start, end and scope of the use of the service, information about having used the service by the user.
3. During using the website, the controller receives data on IP address of the user, proxy server, operating system of the web browser and extensions, device ID and its functions, and the name of the internet service provider or mobile network operator. Use of the website by the user via mobile device allows the data controller to access location data of the user.

§ 7 How do we use collected data?

1. The controller in respect of the personal data ensures of making every effort to ensure that personal data are processed with the greatest respect for the privacy of the data provider and with the highest care for the safety of the processed personal data, and in particular ensures of taking all legal measures to safeguard the personal data collections.
2. The scope of using personal data by the controller depends on the services used by the user within the website and user's preferences. The controller shall process user's personal information in order to:
 - a. establish the content, change, execute or terminate the contractual relationship between the controller and the User, regarding providing the services within the website;
 - b. authenticate and authorize access to the services;
 - c. market, promote, develop and improve own services, including direct marketing and sending newsletter, as well as to advertising purposes, and other actions required to user's business activity;
 - d. contact, send notifications and reminders to the user;
 - e. fulfil legal duties by the controller in connection with running business activities;
 - f. recover the debts;
 - g. provide advertisement service of the user;
 - h. maintain, develop and analyse a relationship with the user, and creating statistics;
 - i. generate statistic data.

§ 8 Data storage period

1. The user's personal data are stored for the whole time of having the user account or providing services, but if the user has agreed to process data also after removal of the user

account from the website and discontinuation of service provision - then until revoking the consent.

2. The controller stores personal data of the users after closing the user account also if it is necessary to: fulfil legal duties, settle disputes, enforce payments of the user on the basis of the user's activity within the website, maintain safety, prevent fraud and misuse.

§ 9 Cookie policy

1. The controller uses cookies to ensure the highest quality of the website and provided services. Cookies are analysed to determine which subsites are visited the most, which browsers are used by visitors and whether the website structure is free of errors. Cookies allow to assure safety of the user accounts.
2. The controller may use the following types of cookies:
 - a. temporary which are deleted after leaving the site or turning off the web browser;
 - b. permanent that are stored on the end user's device for unspecified period of time, or until the user manually deletes them;
 - c. statistical to track traffic on the website;
 - d. functional, allowing personalization of the site in relation to the user;
 - e. advertising to provide the user with content adjusted to his personal preferences;
 - f. necessary and safety, regarding the maintenance of safety rules within maintenance of the website and authentication rules.
3. The controller uses cookies for the following purposes:
 - a. optimization, increasing efficiency and quality of the service;
 - b. correct feature configuration available within the website;
 - c. to personalize of the displayed content and advertisements matching to the visitors of the website;
 - d. to maintain the user session of the service (after logging in);
 - e. keeping safety and reliability of the website;
 - f. to collect and use general and publicly available static data through analytical tools.
4. The user may change own cookie settings at any time by specifying the conditions of storing and granting access to cookies on user's device. Changes to the settings referred to hereinabove may be made via the settings of the web browser or via the configuration of the service. These settings can be changed to block automatic cookie operation in a user's web browser settings or to notify every time when cookies are placed on a device.

§ 10 Data sharing outside the European Economic Area?

1. The personal data processed by the controller shall not be made available to the parties, which are not included hereinabove, in a form that would allow any kind of User identification, unless the User has given a consent, or if the obligation to provide the collected data is based on applicable law.
2. The User's personal data may be shared with the countries outside EEA, however, the controller uses servers to store data which are located in EEA countries.

3. The controller applies approved by the European Commission Standard Contractual Clauses, constituting legal mechanisms for the data transfer outside The European Union, which aims at guaranteeing privacy and safety of the data.

§ 11 Rights of the user

1. The controller represents that the accepted rules of personal data processing ensure all Users to exercise their rights on the basis of the applicable law, in particular:
 - a. the right to access content of the data,
 - b. the right to correct or update the data,
 - c. the right to remove the data,
 - d. the right to limit data processing,
 - e. The right to disagree to data processing;
 - f. The right to transfer the data;
 - g. The right to share copies of the data;
 - h. The right to make a complaint to the supervisory body
 - i. The right to revoke the consent to data processing at any time, regardless of the compliance with the processing law, which has been provided on the basis of the consent before its revoking.
2. In order to exercise the rights specified hereinabove, the User may, at any time, contact the controller via e-mail: dataprotection@rockwall.investments.

§ 12 Changes to the Privacy Policy

1. The controller may change this document and the user shall be informed about it in a way to enable the user to familiarize with the changes before they are effective. If the user has reservations regarding introduced changes, the user may close the user account. Further using of the website after publication or sending notifications about Privacy Policy changes is understood as an act of agreement to collect, use and share personal data of the user pursuant to the amended content of the document