# BULBROKERS

## PRIVACY POLICY
### in effect as from 05/09/2014

### GENERAL CONDITIONS

**Art. 1** This policy shall govern the rights of the Clients of BULBROKERS in processing personal data.

**Art. 2** This policy shall provide the CLIENT with information on:

**1.** data to identify BULBROKERS as a  personal data controller ;

**2.** purposes for processing personal data;

**3.** recipients or groups of recipients to whom the data can be disclosed;

**4.** the obligatory or voluntary manner of data disclosure and consequences in case their provision is denied;

**5.** the right of access and the right to rectify the collected data;

**6.** the period for safekeeping personal data.

**Art. 3** BULBROKERS is a data controller , holder of a certificate № 0022683 issued by the Commission for Personal Data Protection, stating that it is entered in the register of data controllers and registers kept by them.

**Art. 4** By accepting the Privacy Policy, the Client expressly agrees BULBROKERS to collect, use and disclose client´s personal data in the manner described in this Policy.

**Art. 5** Any data provided to BULBROKERS by the CLIENT shall be processed in accordance with the Personal Data Protection Act (PDPA).

### THE PURPOSE FOR PROCESSING PERSONAL DATA

**Art. 6.** BULBROKERS shall use CLIENT´s personal data:

**1.** for identification in connection with conclusion and execution of a contract for provision of investment services and carrying out actions through client's account.

**2.** for direct marketing, including letters with advertising and promotional content, SMS and email advertisements, including such related to for financial products or combined services, provided by or involving BULBROKERS ;

**3.** protection against fraud and increase security of provided services.

**Art. 7 (1).** In connection with opening a client account BULBROKERS should obtain certain information regarding its Client from customers and such as **full name, address, email, phone number and date of birth**.

**(2).** For certain transactions, BULBROKERS also collect also **financial information** such as credit or debit card details.

**(3).** For verification purposes BULBROKERS reserve the right to request proof of CLEINT's identity and address.

**(4).** When using BULBROKERS' on-line services, CLENT's **IP address** and **login time** shall be recorded and stored to protect against fraud and increase security of the services provided.

BULBROKERS may also collect and access data to prevent opening of multiple account or other fraudulent behaviour or to protect the system against illegal actions or abuse.

**(5).** Cookies

To make using Bulbrokers' websites as straightforward as possible and to improve the service it offer, Bulbrokers uses cookies. Cookies do not give Bulbrokers access to your computer or any other information about you. They only improve your interaction with the website and the trading platform. Cookies are harmless text files that web servers can store on your computer's hard drive when you visit a site. They allow the server to recognise you when you revisit.

Bulbrokers uses cookies to:

Gather customer journey information across its sites; Ensure user privacy in secure sites; Store login details for the secure sites; Store details of users' marketing and product preferences to improve the targeting and enhance users' journey through the sites; Evaluate sites' advertising and promotional effectiveness; Bulbrokers uses both its own (first party) and partner companies' (third party) cookies to support these activities.

Bulbrokers uses:

Sessionid
Django_language
lang__
csrftoken

And third parties' cookies:

Google cookies: https://www.google.com/policies/technologies/types/

Facebook cookies https://www.facebook.com/help/115180708570932

In addition, Bulbrokers uses "Google Analytics" to analyse the use of its websites. "Google Analytics" generates statistical and other information about website use by means of cookies on users' computers. The information generated in relation to the websites is used to create reports about the use of the websites. "Google" will store this information. "Google's privacy policy" is available at: http://www.google.com/privacypolicy.html.

Bulbrokers may use third-party advertising companies to serve ads when a user visits its websites. These companies may use information (NOT including your name, address, email address, nor telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to the user.

If cookies are blocked, the user will not be able to use all the features on the websites and trading platforms. The user can also delete cookies already stored on his computer. Again,

doing this may have a negative impact on the usability of Bulbrokers' services.

Find more information about cookies and cookie control here: http://www.allaboutcookies.org/.

**(6).** Depending on the information the CLIENT has provided, his/her current status and the type of transaction he/she wishes to implement, BULBROKERS may collect **additional information** from banks, or companies servicing credit or debit cards, companies providing identification services, etc..

## DISCLOSURE OF INFORMATION TO THIRD PARTIES

**Art. 8 (1).** Customer's personal data will be handled only by authorized employees of BULBROKERS and by physical and / or legal entities with the status of "processor of personal data" within the meaning of the PDPA.

**(2).** The personal data of the CLIENT shall not be disclosed to third parties (natural persons or legal entities), except when required by law and provided in the following hypotheses.

**(3).** BULBROKERS shall disclose certain information to banks or companies servicing credit or debit cards, companies providing identification services, etc as part of his normal business operations.

Any disclosure of information shall aim to identify and verify users, reduce the risk of fraudulent behavior and manage financial risk.

Upon verification of identity or prevention of fraud, the service provider can keep record of all client's orders and his/her data.

Exclusivelly, BULBROKERS may share such data to third parties that provide security services and support in data analysing.

By using our on-line services the CLIENT expressly agrees with the disclosure of his/her personal information for these purposes.

**(4).** The personal data of the CLIENT may be disclosed to third parties outside the European Economic Area ("EEA") if necessary for providing the services requested by the CLIENT, for example if the CLIENT transfers funds to a merchant that is not located in the EEA.

The CLIENT expressly gives his/her consent for disclosure of personal data in such cases.

Collection and use of personal data may also be governed by the Privacy Policy of third parties if the third parties provide services requested by the CLIENT.

## DISCLOSURE OF DATA. CONSEQUENCES OF REFUSAL TO DISCLOSE DATA

**Art. 9** The CLIENT provides personal information voluntarily to the origins and development of the contractual relationship between BULBROKERS and the CLIENT, possible refusal to provide personal data would mean a refusal on his part to enter into contractual relations with BULBROKERS.

# BULBROKERS

## RIGHT OF ACCESS AND RIGHT TO RECTIFY PERSONAL DATA

**Art. 10** The CLIENT shall have the right:

**1.** to access his/her personal data related;

**2.** at any time to request confirmation from  from BULBROKERS confirmation of the processing of personal data related to him, information for the purposes for which they are processed, information for the data categories and the recipients or categories of recipients to whom data are disclosed;

**3.** to receive a message in a comprehensive form containing his/her personal data that is processed and any available information concerning the source, or the algorithm of processing the said information ;

**4.** to request from BULBROKERS to delete, rectify or lock his personal data which processing does not meet the requirements of the PDPA and to notify third parties to whom the personal data is disclosed of any alternations, correction or blocking, except where it is impossible or involves a disproportionate effort;

**5.** to object before BULBROKERS against processing of his/her personal data in the presence of legal grounds;

**6.** to object against processing of personal data for direct marketing;

**7.** to be informed before his/her personal data is disclosed for the first time to third parties or used on their behalf for the purposes of direct marketing, while having the right to object to such disclosure or use, his/her rights of access and other rights are exercised with a written application to BULBROKERS signed by him/her or other person expressly authorized by him through Power of Attorney.

**Art. 11** Upon occurance of any change in the personal details (such as clent´s name, address, or telephone number) the CLIENT shall immediately update his/her details in the "Profile" section of his/her Bulbrokers Account or by contacting Customer Service.

**Art. 12.** Client´s address and phone number can only be changed once in any 3 months.

**Art. 13.** BULBROKERS shall not be liable for any loss arising from client´s failure to update his personal details.

**Art. 14.** In order to terminate his contract and to deactivate his account the CLIENT shall contact Customer Service.

## PERIOD OF SAFEKEEPING PERSONAL DATA

**Art. 15.** BULBROKERS shall safekeep, process and use personal data provided by the CLIENT within 5 (five) years from the signing of the contract, if other enactments do not provide for, otherwise.

**Art. 16.**  By accepting this Policy, the CLIENT gives his explicit consent to BULBROKERS, in its capacity of a data controller, to store, process and use all provided by the Client data for the abovementioned purposes and periods.