

Introduction

Skybound Wealth Europe Ltd (previously Fenix Capital Markets Trading Ltd) (the “Firm”) is committed to protecting your privacy and confidentiality of all personal information we may collect from you irrespective of the medium in which this information is received (ie written, verbal).

The Firm is licensed and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”), under licence number 308/16, which allows the Company to operate as a Cyprus investment fund for the provision of investment services.

The purpose of this policy is to set out the type of information we collect, how we may use this information and under what circumstances (if any) this information may be shared.

This privacy policy is designed to ensure compliance with all applicable laws and regulations.

This policy is subject to change and you acknowledge that the Firm reserves the right to amend this policy as so required in the future. We would therefore recommend that you periodically review our policy statement to ensure that you are up to date with our policy in this respect.

This policy was last updated on November 2022.

Information Collection

As a Firm we place great importance on the protection of any personal information you may provide to us and when we use any information provided it is managed with respect for the confidentiality and privacy afforded when provided.

The information we gather and retain helps us to provide you with a high level of customer service and enables us to provide you with appropriate, suitable services, respond to your enquiries and manage your accounts and transactions in accordance with our regulatory requirements set by CySEC and to comply with all other legal and regulatory obligations.

In particular, we use your personal information with respect to the below:

- Conducting “Know Your Client” activities, including anti-money laundering and risk screening checks for the prevention, detection and investigation of crimes, sanctions, corruption etc.;
- Evaluating customer service, efficiency and cost and for risk management purposes;
- Internal and external audit monitoring and complaints management;
- Complying with our legal and regulatory obligations;
- Responding to your request for information; and
- Communicating with you.

Our ability to provide you with financial advisory services is dependent on us obtaining relevant and necessary personal information about you which can include any of the following:-

- Personal details
- Contact details
- Family details
- Marital status
- Employment information
- Residency status and information,
- Current financial situation (assets, liabilities, expenditure, insurances, pensions)
- Your attitude to investment (including investment risk, preferences)

In gathering this information, it enables us to provide you with tailored personal advisory services and helps us to build a picture of your requirements to ensure that any advice we may provide is suitable and appropriate to your needs.

To gather this information we will generally use a Financial Planning Questionnaire or Fact Find. However, we may also obtain information from you during the course of conversations with you either face to face or via electronic communications eg Teams meetings or telephone calls.

During the course of any relationship we have with you we may collect additional information from you or update the information we already hold in order to ensure that our services remain appropriate and relevant to you.

Data relating to criminal convictions & offences

We may collect and store sensitive personal data relating to your credit worthiness, criminal convictions and offences.

Such data is only processed where it is necessary for:

- Complying with our obligations under the relevant laws and especially under The Prevention and Suppression of Money Laundering and Terrorist Financing Law, L.188(I)/2007 (as amended);
- Preventing and detecting of an unlawful act;
- Reasons of substantial public interest; or
- Establishing, exercising or defending our legal rights and/or claims.

Recording of communication

We may, in our sole discretion, record all telephone and/or email conversations (and/or any other means of communication) for quality control, security purposes and in order to comply with our legal obligation to uphold orderly, fair and transparent financial markets.

How we Protect Your Information

Security of our client information is of paramount importance to us and one of our greatest responsibilities.

Our safeguards ensure that the Firm complies with the necessary data protection regulations to ensure that your information is protected and these are subject to regular reviews to ensure that we are able to respond to changes in technology. We also ensure that our policies and procedures are such that they protect against any unauthorised disclosure or use of information.

Access to personal information is restricted to those who need to access it in order that we may provide our services to you.

Once our relationship has ended, we will still manage and treat your information in the same manner as we would if you were still a client.

Sharing Information

We will not share your information with third parties for use in marketing their products or services. However, we may share your information with third parties in the course of our relationship with you where so permitted or required to by law. For example we may share information with:-

- service providers in the course of the provision of our services to you in relation to financial products or services that you have requested (such as insurance companies, banks, other financial institutions)
- service providers who may assist us with a variety of business activities including marketing on our behalf, customer service, account administration, online support and research
- to prevent against potential or actual fraud, unauthorised transactions, claims etc.
- with government agencies, regulatory authorities such as the CySEC, law enforcement agencies and auditors

Any third parties with whom we share your information will and are required to protect any information provided by us and may only disclose information as so required by law.

The Firm is part of a wider Skybound Group and there may be occasions where your information is shared within other companies within the Skybound Group. This will be to ensure that we are able to provide you with the best advisory services and investment advice and to ensure that the advice is suitable and appropriate for you. Any information shared between the wider Skybound Group of companies will be in accordance with the above criteria as we would with other third parties.

How long we keep your information

We will keep your personal information for as long as required for the purposes of this policy, or as required by the relevant law.

Your rights

Right of access to your information and updating your information:

- You have the right to access personal information that we are processing and hold about you. Also, upon your request, we shall provide you with a relevant copy of them. Please note, that for any further copies, we may charge a reasonable fee based on our administrative costs; and

- You may request us to correct or remove any information that is inaccurate and/or not up to date by sending us a relevant email at [email].

Right to object to processing of personal data:

You have the right to object at any time to the processing of your personal information, on grounds relating to your particular situation.

To that effect, we shall no longer process your personal information unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Right to be forgotten:

You have the right to request erasure of your personal information, in order for any information that there is no good reason for us to continue process it and/or upon exercise of your right to object to processing as described above, to be deleted or removed.

Right to rectification:

You have the right to request the rectification of any inaccurate and/or incomplete personal information.

Right to data portability:

You have the right to receive your personal information in a structured, commonly used and machine-readable format, in order to be transferred to another data controller.

Cookies

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites. Our cookies help us:

- Make our website work as you'd expect
- Save you having to login every time you visit the site
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you
- Make our marketing more efficient (ultimately helping us to offer the service we do at the price we do)

We do not use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass personally identifiable data to third parties
- Pay sales commissions

You can learn more about all the cookies we use below

Granting us permission to use cookies

If the settings on your software that you are using to view this website (your browser) are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

Website Function Cookies

Our own cookies

We use cookies to make our website work including:

- Determining if you are logged in or not
- Remembering your search settings
- Allowing you to add comments to our site

There is no way to prevent these cookies being set other than to not use our site.

Third party functions

Our site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube video. Our site includes the following which use cookies:

- Youtube

Disabling these cookies will likely break the functions offered by these third parties

Social Website Cookies

So you can easily “Like” or share our content on the likes of Facebook and Twitter we have included sharing buttons on our site. Cookies are set by:

- [Google Analytics - Privacy Policy](#)
- [Google AdWords - Privacy Policy](#)
- [LinkedIn - Privacy Policy](#)
- [Facebook - Privacy Policy](#)
- [Instagram - Privacy Policy](#)

The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

Visitor Statistics Cookies

We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at etc. This helps us to continuously improve our website. These so called “analytics” programs also tell us if how people reached this site (e.g. from a search engine) and whether they have been here before helping us to put more money into developing our services for you instead of marketing spend.

We use:

- Google Analytics
- Google AdWords
- Facebook Pixel
- LinkedIn Pixel

How we safeguard your personal information

We restrict access to your personal information to those employees, agents or other parties who need to know such information in order to provide you with support and/or other services.

Turning Cookies Off

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. However, in doing so you will likely limit the functionality of as cookies are a standard part of most modern websites.

Exercise your rights

You may exercise any of your rights as described in this policy, as well as pursuant to the relevant law, by sending us a relevant email at [email].

There is no charge for the exercise of your rights. However, in case your requests are obviously unfounded or excessive, in particular due to their repetitive character, we may either: (a) charge a reasonable fee based on our administrative costs of providing you the information or taking the action requested; or (b) refuse to act on such request.

Where we have reasonable doubts with respect to the identity of the person making the request, additional information necessary for confirmation purposes of the identity of such person may be requested.

Complaints

We are committed to working with you in order to obtain a fair solution of any bona fide concern, grievance or complaint with respect to our data privacy management procedures and practices. Please refer to our Complaints Management Policy which can be found on our website www.skyboundwealth.eu.

Also, you have the right to make your complaint regarding our data processing activities to the Office of the Commissioner for Personal Data Protection in the below contact details:

Address: Iasonos 1, 1082 Nicosia, Cyprus

Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus

Telephone: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

Website: <http://www.dataprotection.gov.cy>