

Data Privacy Policy DSGVO/GDPR

Updated 22 August 2024

Introduction

This data privacy policy provides you with information about the processing of personal data (1) while using this website thalos-investment.com, (2) when interacting with us, for example, when you contact us or when you sign up to receive information by e-mail from us (including for marketing purposes), and (3) in connection with the conclusion of a contract or the set-up of a customer account.

The abbreviation GDPR stands for Regulation (EU) 2016/679, the General Data Protection Regulation, which concerns people in the EU who visit our website (hereinafter “EU data subjects”).

Name and address of the controller

Within the meaning of the General Data Protection Regulation, other data protection laws in the Member States of the European Union and other provisions related to data protection, the controller is:

THALOS INVESTMENT PLATFORM S.A.

18, rue du Village

L-6240 Graulinger

Luxembourg

Telephone +352 621 689

E-Mail hello@thalos-investment.com

Disclosure of data to third parties

In principle, we do not disclose the personal data communicated to us to third parties (i.e., especially not for advertising purposes).

However, we cooperate with third parties for the operation of these websites or for the provision of products/services. Third parties may, however, receive knowledge of personal data in this process. We carefully select our service providers – in particular with regard to data protection and data security – and take all data protection measures necessary for permissible data processing.

Data processing outside the EU

Except for Switzerland, we do not process your personal data outside the EU. The EU recognized that Switzerland offers an adequate level of data protection by Decision 2000/518/EC. However, some of our service providers, whose plug-ins and tools we use, process data outside the EU. This will be clarified within this data privacy policy in the information about the plug-ins/tools used.

We ensure the appropriate level of data protection in the context of participation in the so-called Privacy Shield and the measures taken by the service provider for data protection and data security.

Your rights

In accordance with GDPR, you have certain rights. These rights may be exercised under the conditions and within the limits set by these regulations.

Right of access

In accordance with Article 15 GDPR, you have the right to request confirmation from us as to whether

personal data relating to you is being processed. If this is the case, you have a right to access information about this personal data and to further information mentioned in Article 15 GDPR.

Right to rectification

In accordance with Article 16 GDPR, you have the right to request that we immediately rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure

You have the right to request that we immediately erase personal data concerning you. We are obliged to erase personal data immediately, provided that the corresponding requirements of Article 17 GDPR are met. Please refer to Article 17 GDPR for details.

Right to restriction of processing

In accordance with Article 18 GDPR, under certain circumstances, you have the right to request that we restrict the processing of your personal data.

Right to data portability

In accordance with Article GDPR, you have the right to receive the personal data that you have provided us in a structured, common and machine-readable format, and you have the right to have us transfer this data to another controller without hindrance, provided that the processing is based on a declaration of consent pursuant to Article 6 (1) a) GDPR or Article 9 (2) a) GDPR which is based on a contract pursuant to Article 6 (1) b) GDPR and the processing is carried out by automated means.

Right of objection

In accordance with Article 21 GDPR, you have the right to object to the processing of personal data concerning you as based on Article 6 (1) e) or f) GDPR. This also applies to profiling based on these provisions.

If we process your personal data for direct marketing purposes, you have the right at any time to object to the processing of your personal data for the purposes of such marketing. This also applies to profiling insofar as it is associated with such direct marketing.

If you wish to exercise one of your rights, please contact us as the controller using the contact information indicated above or use any of the other forms we offer to communicate with us. If you have any queries, please contact us.

Right to lodge a complaint with a supervisory authority

In accordance with Article 77 GDPR, without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the supervisory authority. This right exists in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

Server log files

When you visit our website, the company we use to operate the website processes and stores technical information about the terminal device used by you (operating system, screen resolution and other non-personal features) and about the browser (version, language settings), in particular the

public IP address of the computer you use to visit our website, including the date and time of access. The IP address is a unique numeric address under which your terminal device sends/retrieves data to/from the Internet. Unless you share data that allows us to identify you while using our website, our service provider or we are generally unable to know to whom an IP address belongs. Furthermore, a user may be identified if legal action is taken against them (e.g., in the case of attacks on the website) and we become aware of their identity during the investigation. As a rule, you need not worry about us being able to assign your IP address to you.

Our service provider uses the processed data in a non-personally identifiable manner for statistical purposes so that we can trace what kind of terminal devices, with which settings, are used to access our website and then optimize them accordingly. These statistics do not contain any personally identifiable data. The legal basis for compiling the statistics is Article 6 (1) f) GDPR.

The IP address is further used so that you can technically access and use our website and detect and ward off attacks against our service provider or our website. Unfortunately, attacks designed to harm website operators or their users (e.g., to prevent access, spy on data, distribute malware [e.g., viruses], or for other unlawful purposes) are repeatedly carried out. Such attacks would impair the proper functioning of the data center of the company we have commissioned, the use of our website or its features, and the security of visitors to our website. The IP address and the time of access are processed to ward off such attacks. By means of this processing, we – by way of our service provider – pursue the legitimate interest of ensuring the functionality of our website and preventing unlawful attacks against us and our website visitors. The legal basis for processing is Article 6 (1) f) GDPR.

The stored IP data is deleted (by means of anonymization) as soon as it is no longer required for the detection of or defense against an attack.

Contact details

If you send us a message via one of the contact options offered (e.g., via e-mail or telephone), we will use the data you have communicated to us to process your request. The legal basis for this is our legitimate interest in answering your request in accordance with Article 6 (1) f) GDPR. If your request serves the conclusion of a contract with us, the further legal basis for processing is Article 6 (1) b) GDPR. The data will be deleted after the completion of your request. If we are required by law to store the data for a longer period, the deletion will take place after the appropriate period expires.

Registration / Customer account

Upon creating a customer account, we shall process the data you provide to create and manage the account and to enable you to use the services associated with your customer account. The legal basis for processing is Article 6 (1) a) GDPR. If the creation of the customer account serves the conclusion of a contract with us, the additional legal basis for the processing is Article 6 (1) b) GDPR.

This data is stored until the customer account is deleted. If we are required by law to store the data for a longer period (e.g., to fulfill accounting obligations) or are permitted by law to store the data for a longer period (e.g., due to an ongoing legal dispute against the holder of a user account), the data shall be deleted after the end of the storage obligation or statutory permission.

Cookies

We use cookies and similar technologies (local storage) for operating our website to ensure the website's technical functionality, to understand how visitors use our website and to store users'

predefined settings in their browser.

A cookie is a small text file that your browser stores on your computer when you access our website. If you revisit our website later, we can read these cookies again. Cookies are stored for different periods of time. You may at any time configure which cookies your browser shall accept. This may, however, cause our website to no longer function properly. Furthermore, you can delete cookies yourself at any time. If you do not delete them, we can specify for how long a cookie is to be stored on your computer. The distinction is made here between so-called session cookies and persistent cookies. Session cookies are deleted by your browser when you leave our website or close the browser.

Persistent cookies are stored for the period that we specify during the storage.

We use cookies for the following purposes:

- Technically necessary cookies that are required for the use of the functions of our website (e.g., to identify that you have logged in). Certain functions cannot be provided without these cookies.
- Functional cookies that are used to technically perform certain functions that you want to use.
- Analysis cookies that serve to analyze your user behavior.
- Third-party cookies. Third-party cookies are stored by third parties whose functions we integrate on our website to enable certain functions. They can also be used to analyze user behavior.

Most of the browsers used by our users allow us to configure which cookies are to be stored and make it possible to delete (certain) cookies. If you restrict the storage of cookies to certain websites or do not allow cookies from third-party websites, it may no longer be possible to make use of the full functionality of our website. Information on how to customize cookie settings for the most common browsers is available here:

- Google Chrome (<https://support.google.com/chrome/answer/95647?hl=en>)
- Internet Explorer (<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>)
- Microsoft Edge (<https://www.microsoft.com/en-us/edge/learning-center/how-to-manage-and-clear-your-cache-and-cookies>)
- Firefox (<https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>)
- Safari (<https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>)