

TERMS OF AND CONDITIONS FOR THE USE OF THE WEBSITE, PRIVACY AND COOKIES POLICY

By accessing the ZEMBLANCO INVESTMENTS Ltd (“We” or “the Company”) website and any pages linked thereto, you the User agree to be bound by the terms and conditions as described below. By continuing to use of this website you are also consenting for the use of cookies.

TERMS AND CONDITIONS FOR THE USE OF THE WEBSITE

Trademarks-Intellectual Property Rights

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Change of Information and Materials

All information and materials contained in the website of ZEMBLANCO INVESTMENTS LTD, and all terms, conditions, prerequisites and descriptions contained herein, are subject to change without any prior notice.

Limitation of Liability

ZEMBLANCO INVESTMENTS LTD does not provide any warranty as to the accuracy, adequacy or completeness of the information and materials contained in its websites and expressly rejects any liability for any errors and/or omissions in this regard. ZEMBLANCO INVESTMENTS LTD does not provide any warranty of any kind implied expressed or statutory, including but not limited to the warranties of non-infringement of third party rights, title, merchantability, fitness for a particular purpose and freedom from computer virus, in conjunction with the information and materials thereof.

Hyperlinks to other internet resources are followed at your risk; the content, accuracy, opinions expressed and other links provided by these resources are not controlled, investigated, verified, monitored and/or endorsed by ZEMBLANCO INVESTMENTS LTD.

ZEMBLANCO INVESTMENTS LTD shall not be liable for a) any damages, losses or expenses which arise in connection to this website or its use or inability to use by any person or in connection to the inability to execute an order, error, omission, interruption, fault, delay in operation or transmission, computer viruses, communication failure or line or system failure, even if ZEMBLANCO INVESTMENTS LTD or its representatives have been informed about the possibility of such damages, losses or costs and b) for errors or inaccuracies in the transmission process of data or any instructions from the client/visitor of the site, interference, fraudulent impersonation,

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breaking of secret access codes, erroneous recording or transmission of message or system failure due to force majeure or for whatever other reason which is not due to breach of the above either by ZEMBLANCO INVESTMENTS LTD.

ZEMBLANCO INVESTMENTS LTD shall not be liable for any damage that may occur to the hardware or software of the user that may arise as a result of the use of this website and/or land or in connection of this website with other websites/hyper test links or internet resources.

Intended Users

This website is not intended for any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation. You should not use our website if you disagree with this document.

Third Party Links

Our website(s) contain links to websites operated by other parties. We provide the links for your convenience, but we do not review, control or monitor the privacy or other practices of websites operated by other. We are not responsible for the performance of websites operated by third parties or for your business dealings with them. You should carefully read the Privacy Policy and terms of use of those third party websites and decide for yourself if you wish to use them.

Governing Law

Use of this site shall be governed by the Laws of the Republic Cyprus.

COOKIES POLICY

Cookies are a kind of short term memory for the website. They are stored in your browser and enable a site to 'remember' little bits of information between pages or visits. Some of the purposes of installation of Cookies or similar applications may also require the separate consent of the user.

Consent to Cookies

By continuing to use our website, you are giving your consent for Cookies to be installed.

Types of Cookies

Technical Cookies and Cookies serving aggregated statistical purposes

Activity strictly necessary for the functioning of the service : This Application uses Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of the same, for example in relation to the distribution of traffic.

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Activity regarding the saving of preferences, optimization, and statistics: This Application uses Cookies to save browsing preferences and to optimize the User's browsing experience. Among these Cookies are, for example, those to set the language and the currency or for the management of first party statistics employed directly by the Owner of the site.

Other types of Cookies or third-party tools

Some of the services listed below collect statistics in aggregated form and may not require the consent of the User or may be managed directly by the Owner – depending on how they are described – without the help of third parties.

If any third-party-operated services are listed among the tools below, these may be used to track Users' browsing habits – in addition to the information specified herein and without the Owner's knowledge.

Interaction with external social networks and platforms: These services allow interaction with social networks or other external platforms directly from the pages of this Application. The interaction and information obtained by this Application are always subject to the User's privacy settings for each social network. If a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when Users do not use it.

Google +1 button and social widgets (Google Inc.)

The Google button and social widgets are services allowing interaction with the Google+ social network, provided by Google, Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network, provided by Facebook, Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA

Tweet button and social widgets (Twitter, Inc.)

The Tweet button and social widgets are services allowing interaction with the Twitter social network, provided by Twitter, Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA

Linkedin button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network, provided by LinkedIn Corporation.

Personal Data collected: Cookie and Usage data.

Place of processing : USA

YouTube button and social widgets (Youtube Corporation)

The YouTube button, video and social widgets are services allowing interaction with the Youtube social network, provided by YouTube, LLC.

Personal Data collected: Cookie and Usage data.

Place of processing : USA

Statistics

The services contained in this section are used to the Owner to monitor and analyze traffic data and are used to keep track of User behavior.

Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analytics service provided by Google Inc. (“Google”). Google uses Personal Information collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics makes anonymous your IP address. The anonymisation shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google’s servers and statements within the United States.

Personal Data collected: Cookie and Usage data.

Place of treatment: USA

Displaying content from external platforms

These services allow you to view content hosted on external platforms directly from the pages of this Application and interact with them. If a service of this kind is installed, it may still collect web traffic data for the pages where the service is installed, even when users do not use it.

Google Maps Widget (Google Inc.)

Google Analytics is a web analytics service provided by Google Inc. (“Google”). Google uses Personal Information collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics makes anonymous your IP address. The anonymisation shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google’s servers and statements within the United States.

Personal Data collected: Cookie and Usage data.

Place of treatment: Google Maps - USA

How can You manage the installation of Cookies?

You can control and/or delete cookies as you wish directly from within your own browser and prevent – for example – third parties from installing them. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. It is important to note that by disabling all Cookies, the functioning of this site may be compromised. For further information about cookies and how to disable them, please refer to www.allaboutcookies.org.

PRIVACY POLICY

Our Commitment to You

We understand the importance of maintaining the confidentiality and privacy of Your Information. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of Your Information.

Safeguard Measures

Your Information is stored on secure servers.

We limit access of Your Information only to those employees or partners that need to know the information in order to enable the carrying out of the Agreement between us.

We have procedures in place regarding how to safeguard and use Your Information, for example by requesting our Affiliates and employees to maintain the confidentiality of Your Information.

We will not keep Your Information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under Applicable Regulations, we will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for at least five years after termination of the Agreement between us. In any event, we will keep Your Information for the duration of applicable Limitation of Actions Laws as a minimum.

While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

Types of Personal data collected

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Personal Information includes any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

Among the Personal Information collected via our website and its Applications, either independently or through third-parties, there are: Name, Surname, Telephone Number, Email, the IP addresses or domain names of the computers utilized by the Users, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within a specific application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

The Personal Data may be entered voluntarily by you, or collected automatically when using one of the applications. Any use of cookies – or other tracking tools – aims to identify the User and register their preferences for purpose closely tied to the provision of the service you request.

Use of Personal Data

Any personal Data that will be collected by ZEMBLANCO INVESTMENTS LTD through this website, shall be processed according to the Personal Data Law (Law 138(1)/2001), as amended or replaced from time to time.

The user of this website hereby agrees that:

(i) ZEMBLANCO INVESTMENTS LTD has the right to process Personal Data in order to support, promote and realise our relations.

(ii) ZEMBLANCO INVESTMENTS LTD will not communicate or disclose such Personal Data to any third party, unless pertaining to: (1) a company/companies to which ZEMBLANCO INVESTMENTS LTD has partly or fully assigned the realisation of the processing of such data in accordance with the law and this Privacy Policy, (2) such communication or disclosure which may be required by law or by a court decision and (3) where you are a client of the Company according to the Terms and Conditions which also apply between the Company and its Clients.

(iii) The User's Personal Data may be used for the defense by ZEMBLANCO INVESTMENTS LTD before the Financial Ombudsman, the Cyprus Securities and Exchange Commission or other relevant authority, in court or in the stages leading to possible legal action, against improper use of the same or related services by the User. The User declares to be aware that the owner may be required to disclose the information requested by the public authorities.

(iv) In order to perform security checks for the integrity of the website, check compliance with these Terms and Conditions for the use of the Website or other obligations of the User, and compliance with the Terms of Conditions between the Company and its Clients.

You Rights

Those whose Personal Data we keep refer have the right at any time to obtain confirmation of the existence of the same from the Data Controller, to know the content and origin, to check its accuracy or request its integration, deleting, updating, rectification, erasure, anonymization or blocking of Personal Data processed in violation of law, and to oppose in any case, for legitimate reasons, to their treatment.

To make a request, please contact us, verifying your identity and specifying what information you require. We may charge an administrative fee.

You may contact us via e-mail info@zemblanco.com

Data Controller and Owner

ZEMBLANCO INVESTMENTS LTD

Data Processor (or Data Supervisor)

ZEMBLANCO INVESTMENTS LTD may authorize another natural person, legal person, public administration or any other body, association or organization authorized to process the Personal Data in compliance with this Privacy Policy, on its behalf.

Questions

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at info@zemblanco.com

Changes to this privacy policy

The Data Controller reserves the right to make changes to this Cookies and Privacy Policy at any time by giving publicity to the Users on this webpage. Therefore please check this page often, by reference to the date of last modification indicated at the bottom. In case of rejection of the changes made to this privacy, the user is required to end the use of this website and any applications. Unless otherwise specified, the previous privacy policy will continue to apply to personal information collected until then.

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