

## Privacy Policy

### Introduction

We, at **Sierra Delta Papa** (the “**Company**”, “**us**” or “**we**”) respect your privacy and are committed to protect the privacy of our users (“**user**” or “**you**”).

This Privacy Policy outlines our practices when we collect and use your information, when you access to our websites, which are designed to generate marketing leads (“**Services**”) for the purpose of contacting you to our affiliates and partners (collectively, “**Affiliates**”), who offer online trading services.

Please note that the Company does not offer by itself trading services, but merely enables its Affiliates to contact you and offer you relevant trading propositions.

The Privacy Policy is a part of our Terms of Service and is incorporated therein by references.

**We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using the Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to this Privacy Policy.**

In this Privacy Policy you will read about:

- **What type of information** we collect
- **Cookies**
- **How we use** the information we collect
- **With whom we share the information**, and for **what purpose**
- **User’s rights and retention**
- **How do we safeguard your information**
- **Marketing**
- **How to contact us**

### What type of information we collect

We collect two types of data and information from our users.

- The first type of information is un-identified and non-identifiable information pertaining to a user(s), which may be made available or gathered via your use of the Services (“**Non-personal Information**”). We are not aware of the identity of the user from which the Non-personal Information was collected.

In order to enhance the functionality of the Services and to provide you with a better user experience, we collect technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time and the domain name from which you linked to the Services; etc.).

- The second type of information is individually identifiable information, namely information that can or may be used whether alone or in combination with other information in order to **identify a single person**. Accordingly, such information could

include: (i) data that directly identifies an individual (such as their name, contact details, etc.); and (ii) data that can be combined with other information in order to identify an individual or **single out an individual** (collectively, “**Personal Information**”). We collect the following types of Personal Information:

- **Registration details:** When you register to our Services, you will be asked to provide Personal Information to us. The Personal information we collect through the registration process includes your full name; phone number and e-mail address.
  - **Device data:** We may also collect Personal Information from your device, such as IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your online activity.
  - **Voluntary information:** We also collect information which you provide us voluntarily. For example, when you respond to communications from us, contact our support, communicate with us via email or share additional information about yourself through your use of the Services.
- We may anonymize or de-identify the information collected by the Services or via other means through the web (e.g. social networks) so that the information cannot, on its own, personally identify you. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation and for any purpose.
  - If we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information for as long as it remains combined.

## Cookies

We may use cookies and other technologies in our related Services, including when you visit our website.

A "cookie" is a small piece of information that a website assign to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier.

Our website uses '**session cookies**' which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed.

You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Service may not operate properly and your online experience may be limited.

## How we use the information we collect

In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for the following purposes:

- To generate marketing leads for our Affiliates in order to enable them to offer you trading propositions;
- To market you different services and products (see below under “Marketing”).
- To conduct analytics in order to improve and customize our Services to your needs and interests;
- To support and troubleshoot our Services and to respond to your queries;
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request; and

### **With whom we share the information we collect**

We do not rent, sell, or share your Personal Information with third parties except as described in this Privacy Policy.

We may use your Personal Information, such as your name, email address, telephone number, etc. with our Affiliates for the purpose of providing you with promotional materials, concerning trading services and other promotional materials.

In addition, your Personal Information may be disclosed to other trusted third party service providers for the purpose of: (i) storing or processing Personal Information on our behalf; (ii) assisting us with our business operations, providing our Services and improving it; and (iii) performing research, technical diagnostics and analytics with regard to the Services.

We may disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

### **User’s rights and retention**

We respect your privacy rights and therefore you may contact us at any time and request:

- to access, delete, change or update any Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted); or
- that we will cease any further use of your Personal Information (for example, you may ask that we will stop using or sharing your Personal Information with third parties) or that we shall remove your Personal Information (subject to any other legal obligation that may require us to keep the information).

If you wish to raise a complaint on how we have handled your Personal Information, please contact us to [info@sdp.ltd](mailto:info@sdp.ltd).

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can complain to the applicable data protection authority.

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

### **How do we safeguard and transfer your information?**

We take great care in implementing and maintaining the security of the Services and your information. We employ industry standard procedures and policies to ensure the safety of our users' information, and prevent unauthorized use of any such information. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

Since we operate globally, it may be necessary to transfer your Personal Information to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union – in these instances we will take steps to ensure that a similar level of protection is given to your Personal Information. You hereby consent to transfer of your Personal Information to countries outside the European Union.

If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse our Services or acted in an inappropriate manner, please contact us to [info@sdp.ltd](mailto:info@sdp.ltd).

### **Marketing**

We may use your Personal Information ourselves or by using our third party subcontractors for the purpose of providing you with promotional materials, concerning our Services, as well as products, services, websites and other promotional materials. We may also send you marketing communications related to our Affiliates' products and services.

In addition, we may elect to share your Personal Information with our Affiliates for marketing or other similar purposes. The Affiliates will be prohibited from disclosing or using such information except for the limited purposes which are stipulated in this Privacy Policy.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. In addition, at any time, you may request to unsubscribe and discontinue receiving marketing offers by contacting by sending a blank message with the word "remove" to [info@sdp.ltd](mailto:info@sdp.ltd)

Please note that even if you unsubscribe from our mailing list, we may continue to send out periodic e-mails informing you of technical, service or security issues related to a product or service you requested, confirming you requested a product or service, or providing periodic updates or information relating to the product or service you requested.

### **Corporate transaction**

We may share Information, including Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, database migration, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

### **Minors**

The Services are not designated to users under the age of 18. If you are under 18, you should not download or use the Services nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [info@sdp.ltd](mailto:info@sdp.ltd)

### **Updates or amendments to the Privacy Policy**

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on the website. We encourage you to review this Privacy Policy regularly for any changes. In case of material changes we will notify you through our Services or by email.

Your continued use of the Services, following the notification of such amendments, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

### **How to contact us**

If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us at

### **Information about us**

Sierra Delta Papa,  
3 Rothschild boulevard, Tel Aviv, Israel  
[info@sdp.ltd](mailto:info@sdp.ltd)