



## WEBSITE PRIVACY POLICY

### Information notice pursuant to art. 13 of EU Regulation 2016/679

#### **1. Introduction and purpose of this document. Data controllers.**

**Elysia Capital LTD** (FRN: 922805), 25 Green Street, London England W1K 7AX - an Appointed Representative of Khepri Advisers Ltd (FRN 692447) who is authorised and regulated by the Financial Conduct Authority. Khepri Advisers Ltd is registered in England and Wales, registered address 95 Chancery Lane, London, WC2A 1DT. Khepri Advisers act as the Principal Firm to Appointed Representatives - and its subsidiary **Elysia Capital S.r.l.** (VAT number 11951210019) headquartered in Via Giuseppe Galliano, 27 10100 Turin (Italy) (hereinafter "**Elysia**" or "us") consider the protection of the personal data of its established and/or potential users fundamentally important and ensure that the processing of personal data, carried out by any automated or manual mode, takes place in full compliance with the safeguards and rights recognized in EU Regulation 2016/679 of the European Parliament and of the Council, dated 27 April 2016, concerning the protection of individuals with regard to the processing of personal data and the free movement of such data (hereinafter the "**Regulation**"), and in other applicable regulations concerning the protection of personal data.

This privacy policy (hereinafter the "**Privacy Policy**") aims to describe the management mode of the website <http://elysiacapital.com> (hereinafter the "**Internet Site**"), in reference to the processing of personal data of users/visitors who browse it pursuant to the Regulation.

This Privacy Policy must therefore also be understood as the document with which **Elysia Capital LTD** and its subsidiary **Elysia Capital S.r.l.**, as "**Data controllers**" of the personal data collected and processed through the Site, provide the information referred to in Articles 13 and 14 of the Regulation to those who are browsing the Internet site and interact with the Data controllers by means of the services offered by said Internet site.

#### **2. Type of data processed and purposes of processing relating to navigation on this Internet site**

The Internet site <https://www.elysiacapital.com> offers content of an informational and, sometimes, interactive nature. During the navigation of the Internet site, it is possible to acquire information about the user in the following ways:

- *Navigation data*

The IT systems and software procedures used to operate the Internet site acquire, during their normal operation, some personal data whose transmission is implicit in the use of internet communication protocols.

This category of data includes: IP addresses, browser type, operating system, domain name and addresses of the websites from which it was accessed or exited, the information on the pages visited by users within the site, the time of access, the permanence on individual pages, the internal path analysis and other parameters related to the operating system and to the user's IT environment.

These technical/IT data are collected and used exclusively in an aggregate and non-identifying manner and could be used to ascertain responsibility in case of hypothetical cybercrime against the site. As far as navigation data is concerned, more information can be found in the

[Cookie Policy](#).

- *Data provided voluntarily by the visitor/user*

They are all those personal data (name, last name, identification numbers, information about career and studies, etc.) disclosed freely by the visitor on the Internet site, for example, to register and/or to access a reserved area, to send us their project and to ask for its support, to request information on a given service through a form, to write to an email address or to call (in VoIP mode) a number to have a direct contact with the company.

#### **3. Purposes of the processing and legal basis**

Personal data will be used for the provision of the services requested by the users of the Site, and for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct operation. In particular, data provided voluntarily by the user will be processed to allow their participation in the initiatives promoted by the Site. Finally, the data collected may be processed in order to fulfill legal obligations. The legal basis of the processing therefore resides in the art. 6, letters b) and c) of the Regulation, i.e. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract or processing is necessary for compliance with a legal obligation to which the controller is subject.

#### **4. Data processing methods and storing time**

The processing of personal data is carried out mainly using electronic procedures and media for the time that is strictly necessary, in accordance with Article 5 of the Regulation.

The personal data will be processed by the data controller only to the extent necessary for the pursuit of the main purpose. In particular, the personal data will be processed for a period of time equal to the minimum necessary, as indicated in Recital 39 of the Regulation, i.e. until the termination of the contractual relationship between the data subject and the data controller except for a further storage period that may be imposed by law as envisaged in Recital 65 of the Regulation.

#### **5. Connection to/from third party sites**

From the Internet site it may be possible to connect to other third-party internet sites through dedicated links.

In this regard, **Elysia** cannot be held liable concerning the eventual management of personal data by the third party internet sites and concerning the management of the authentication credentials supplied by third parties.

#### **6. Communication to third parties**

The data collected will not be disclosed and may be communicated to subjects endowed with the faculty and the interest to access the user's personal data by law or by secondary and/or EU legislation, and to the Controller's internal personnel, as well as to companies, associations or professional firms that are providing services and activities on behalf of the Controller as Data Processors for the fulfilment of legal obligations and for every organizational and administrative need in order to provide the requested services. The updated list of Data Processors can be consulted at the reference headquarters of the Data Controller.

## 7. Rights of the data subjects

As provided for by Article 15 of the Regulation, the data subject can access their personal data, ask for their rectification and updating if incomplete or erroneous, ask for their erasure if the collection has taken place in violation of a law or regulation, and to object to the processing for legitimate and specific reasons.

In particular, here are all the rights that you may exercise at any time toward the Data Controller:

**Right of access:** the right under Article 15, paragraph 1 of the Regulation, to obtain from the data controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22, paragraphs 1 and 4 and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

**Right to rectification:** the right to obtain, in accordance with Article 16 of the Regulation, the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure:** the right to obtain, in accordance with Article 17, paragraph 1 of the Regulation, the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing; c) the data subject objects to the processing pursuant to Article 21, paragraph 1 or 2 of the Regulation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing; d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; in some cases, as provided for in Article 17, paragraph 3 of the Regulation, the data controller is entitled not to erase your personal data if their processing is necessary, for example, for exercising the right of freedom of expression and information; or compliance with a legal obligation; for reasons of public interest; for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; for the establishment, exercise or defense of legal claims.

**Right to restriction of processing:** the right to obtain from the controller restriction of processing, pursuant to Article 18 of the Regulation, where one of the following applies: a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; d) the data subject has objected to processing pursuant to Article 21, paragraph 1 of the Regulation pending the verification of whether the legitimate grounds of the controller override those of the data subject. Where processing has been restricted, the personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

**Right to data portability:** the right to request at any moment and to receive, pursuant to Article 20, paragraph 1 of the Regulation, the personal data concerning him or her which he or she has provided to a controller, in a structured, commonly used and machine-readable format and the right to request the transmission of those data to another controller without hindrance. In this case, it is the responsibility of the data subject to give us all the exact details of the data controller to which they intend to transfer their personal data by submitting a written authorization.

**Right to object:** pursuant to Article 21, paragraph 2 of the Regulation it is possible to object, at any moment, to the processing of their personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

**Right to lodge a complaint with a supervisory authority:** without prejudice to the right of recourse via any other administrative or judicial proceeding, if it is considered that the processing of personal data carried out by the data controller is done in breach of the Regulation and/or of the applicable legislation, it is possible to lodge a complaint to the competent Data Protection Authority.

## 8. How to exercise your rights or receive more information

In order to exercise all rights as listed above or to receive more information on the data processing of this website, simply contact the Data controllers in one of the following ways: by sending an e-mail to the address [info@elysiacapital.com](mailto:info@elysiacapital.com) entering "privacy" in the subject line.

## 9. Changes to the Privacy Policy

This Privacy Policy is applicable to the Website from its publication and it supplements and completes any Privacy Policies provided by Elysia within the Site or elsewhere. The possible entry into force of new sector regulations, as well as the constant review and updating of the general conditions of use of the Website, may involve the need to vary this policy. It is therefore possible that this Privacy Policy may undergo changes over time and therefore we invite each user to consult this page periodically.

*Thanks for reading!*

*Last modified on 20 June 2023*