



Website Privacy Policy

This Website privacy policy provides you with details about the personal information (hereinafter the “**data**”).

Grand Lux Industries LLC, a Cayman-incorporated company having its registered seat at 71 Fort Street, 3rd Floor, Grand Cayman, KY1-1111, Cayman Islands (Commercial registry number: 408097) (hereinafter “**Every Finance**”, the “**Company**”, “**we**” or “**us**”). collects from persons visiting its website (hereinafter the “**Visitor(s)**”, the “**Users**” or “**you**”), how and why we use your data and your rights to control personal information We hold about you.

The concept of “**data**” encompasses all the personal data relating to yourself and more specifically any information that allows us to directly or indirectly identify you as a natural person.

We recommend you to read this privacy policy carefully in order to understand our practice in the processing of your data and to be informed of the last version of this privacy policy.

The protection of your data and your privacy is of the utmost importance to us and we therefore ensure to comply with data protection laws including the Cayman Data Protection Act (2021 Revision) (DPA), and any other implementing act or regulations.

1. Our role as a data controller

The data controller responsible for the processing of Your data is Every.Finance.

As a data controller we solely and autonomously determine the purposes of the processing of Your data as well as all corresponding criteria.

For any further information on our data protection practices or concerning your personal data as a Visitor, please contact us at privacy@every.finance.

2. What information we collect, for what purposes and on what legal basis?

First, we may collect the information that you submit to us voluntarily when entering into a business relationship with us or registering with one of our services or events, such as your email address, first and last name, company, country, phone number .

In addition thereto, we may collect supplemental information about your device, our your use of our services (e.g. device network connections (Wifi) and Internet protocol (IP) address, geolocation information (e.g. GPS), address book, and biometric data etc), in ways that we describe in the relevant privacy policy or enrolment form, or otherwise with your explicit consent (e.g. for newsletters).

Further to that, we may process your personal data as necessary for the performance of an agreement we have with you, or as required by law, or in accordance with your explicit consent for such processing, or in a matter commensurate to our legitimate interest and provided that your fundamental rights and freedoms are safeguarded. Our legitimate interest may include the need to personalise our content or website or other general information, to collect information about your experience with our services in order to improve the latter, or the need to better understand your concerns and needs in order to develop innovative service offerings and further develop our activities (including for troubleshooting, data analysis, testing, research, statistical and survey purposes or to administer a contest, promotion, survey or other site feature).

3. With whom and how do we share your data?

We will not disclose, sell or rent your personal data to any third party, except as described in this privacy policy.

We may share personal data with affiliates or third parties who perform data processing activities on our behalf, and only insofar as this is necessary. As far as these service providers are acting as data processors, on our behalf, we do not authorise them to use or disclose the data in any way except as specified in this privacy policy. We require that these data processors appropriately safeguard the privacy and security of the personal data they process on our behalf.

We may disclose your personal information where we are required to do so (i) by applicable law, (ii) by a governmental body, (iii) by a law enforcement agency or (iv) in connection with an investigation of suspected or actual fraudulent or illegal activity.

4. **Transfer of personal data outside the Cayman Islands**

We store your data within the Cayman Islands.

We may need to transfer your data to a country outside the Cayman Islands, including to countries that may not offer an adequate level of protection as defined by the Cayman Islands' Data Protection Act (2021 Revision). In such cases, we will ensure an appropriate level of protection for your data by implementing measures such as standard contractual clauses approved by the Cayman Islands Ombudsman or other legally recognized means to guarantee that your data is transferred in a secure environment.

This revision ensures that your privacy policy complies with the DPA's requirements concerning international data transfers.

5. **What are your rights?**

5.1 **Access, rectification, erasure, portability and objection rights**

For all the purposes defined here above, and within the limits provided by applicable data protection laws, you have rights as a data subject. Every.Finance wants you to be aware of these rights, namely:

- the right to ask us to provide you with copies of personal information that we hold about you at any time, which include the right to ask us: whether we process your personal data, for what purposes; the categories of data; the recipients to whom the data are shared;
- the right to ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge;
- the right to withdraw your consent where such consent has been given;
- the right to erasure within the limits afforded by data protection legislation;
- the right to data portability within the limits afforded by data protection legislation.

Where we process your data for our legitimate interests, you have the right to object to the processing of your data. However, according to our legitimate interests, we may continue to process your data after a careful balancing of your interests with the ones of Every.Finance.

5.2 **Objection right to direct marketing**

When Every.Finance processes your data for direct marketing purposes, you always have the right to opt-out, at first request and free of charge, of any direct marketing communications.

You can exercise your objection right by sending us an email to privacy@every.finance.

5.3 **How to exercise those rights?**

You may at any time exercise the abovementioned rights in accordance with data protection regulations, by sending us a written request with a copy of your ID card (passport or other proof of identity) by email to privacy@every.finance, and subject to complying with our reasonable requests to verify your identity.

5.4 **Right to lodge a complaint**

In the event of a conflict concerning the processing of your personal data, you can contact our Data Protection Officer by email to privacy@every.finance.

You can also lodge a complaint to the Office of the Ombudsman, you can do so by submitting a form on the dedicated website (<https://ombudsman.ky/data-protection>), or by e-mail at info@ombudsman.ky.

6. **How long do we keep your personal data?**

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed. Specifically, we distinguish between a retention period and an archiving period:

- The retention period is the maximum period of use of your personal data for specific purposes:
 - o the data processed for the execution of the contractual relationship is kept for the entire duration of the contract/membership and for the prescription period upon termination of the contract;
 - o the data processed for other purposes may be retained for a longer period during which we will reassess the need to keep this data and pseudonymised the data where it does not affect the realisation of the purposes.

- The archiving period meets our legal obligation as well as the legal need to retain your data beyond the retention period for evidentiary purposes or to respond to requests for information from the competent authorities.

7. How do we protect your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data, against unauthorised or unlawful processing and against accidental destruction, loss, access, misuses, damage and any other unlawful forms of processing of the personal data in our possession.

8. Changes to our Privacy Policy

We may revise our Privacy Policy from time to time to reflect changes to our business, services or relevant laws. Any changes we make to our Privacy Policy in the future will be posted on this page with immediate effect from the date of publication and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

9. How to contact us?

If you have any questions or comments about this privacy policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us here:

By email to privacy@every.finance.

Last updated on 15 November 2024