



**CIF License no. 303/16**

*Regulated by the Cyprus Securities & Exchange Commission*

## **COOKIES POLICY**

**MARCH 2021**

## 1. Introduction

Rynat Trading Limited hereon referred to as the “Company” is a Cypriot Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 344135. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under the license No. 303/16.

The Investment Services and Activities and Regulated Markets Law (L.87(I)/2017), including all its amendments and the Directives issued by CySEC (the “Regulations”) are the regulatory framework that governs Trading in Financial Instruments.

## 2. Policy

This Policy for the Cookies (the “Policy”) provides an overview and explanation related to the online use of the Company’s branded websites [www.rynattrading.com](http://www.rynattrading.com); [www.xtrend.com](http://www.xtrend.com); [www.xhorns.com](http://www.xhorns.com) , [www.xlearner.eu](http://www.xlearner.eu) (hereafter “websites”).

## 3. Cookies

Cookies are small text files stored by a web browser on the computer or device whenever certain web pages are visited or certain actions are performed on the Company’s website and other websites. They are used to help the browser remember the visitor’s choices and display the correct information for the visitor - such as items in one’s basket - and not treat the individual as a new visitor each time a page is visited.

Some Cookies are only set for the duration of a visit (“session cookies”) to help the visitor get around and provide relevant information. Others are set for longer periods (“persistent cookies”) so that the browser can remember choices from a previous visit. The Cookies stored cannot harm a user’s device, are anonymous, and unique to his/her browser.

For more detailed information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 4. How We Use Cookies

The Company uses cookies to:

- i. help the Company find which services a client is interested in and remember details about client’s application

- ii. monitor and analyse use of the website and for the technical administration of the website
- iii. improve the website
- iv. generate and derive useful data and information concerning the interests, characteristics, use and behaviour of our visitors.

The Company does not store sensitive information like a client's name or address in Company's cookies, just an anonymous reference to them so that the Company is able to find them. The Company also occasionally sets Cookies to help a user navigate around the site, enhance his/her experience, or give him/her important information regarding interests.

The Company may share aggregated information, including queries and offers generated as a result of client's use of the website, that includes non-identifying information and Log Data, with third parties for industry analysis, demographic profiling, other commercial purposes and to deliver targeted advertising about products and services. Any aggregated information shared in these contexts will not contain any personal information.

The Company cooperates with government and law enforcement officials and private parties to enforce and comply with the law.

In addition, the Company may post additional ancillary privacy notices with respect to specific services.

## **5. Your Consent to Collection and Use of Information**

Please note that when a visitor access the Company's Website the Company collects non-identifiable information in the following ways:

- Log Data
- Personal Information
- Cookies (including third party Cookies)

By using the Company's Website and allowing Cookies on the browser gives the Company access to certain information. Similarly, when manually submitting personal information to Company's website, you consent to the collection and use of that information as set out in this Cookie Policy. If there is a change in our Cookie Policy the Company will post the changes on our website, so

that users can be aware of the information collected and how these data are used at all times. Continued use of Company's Website will signify that you agree to any such changes.

## **6. Cookies Settings**

If a user does not want to receive certain categories of Cookies from the Company's Website, the individual can opt-out of them. The Company will need to set a Cookie so that choices can be remembered on future visits to the website from the same browser. Currently it is not technically possible to allow one to carry their settings between browsers and devices, so the user needs to change these settings from each browser used.

Please also be aware that the Company makes every effort to respect a user's choices, however, there is the possibility that not all Cookies will be captured. If this is a concern, then it is recommended to change the Cookie settings on the browser.

A user can choose to disable or block these cookies in the browser but without some of them the Company's site may not work properly, and the user experience will be affected.

## **7. Third-Party Cookies**

For a visitor to have the best possible experience, the Company may partner with some third-parties to help in the collection of anonymous statistics about how the Website is being used and provide the user with further information that may be of interest. As part of this process the third-party partners may set their own Cookies during a visit to the Website.

A "cookie" is a small text file that may be used, for example, to collect information about the User's activity in relation to the Services and it may serve to recall Personal Information previously indicated by a User, such as his/her user ID and password for access to the Service(s). In particular, the Company's technology providers might be using "Flash Cookies" and/or local storage technologies to help users access the Client's accounts seamlessly and save their account settings to their browsers. Do note that most browsers allow controlling cookies, including if to accept them and how to remove them.

## **8. Log Data**

When a user accesses the Website, information is collected that the browser sends whenever the Website, or an online service is visited ("Log Data"). This Log Data may include, but is not limited to, user's computer Internet Protocol address, browser type, the web page visited before

entering to the Website and information searched for on the Website. In addition, if the Website is accessed via a mobile device, a PushID may be collected, subject to the user's consent as indicated in the mobile application, and a Mobile IP.

## **9. Scope of the Policy and Third-Party Sites**

This Policy applies only to the Company and its operating Website(s). The Company does not exercise control over other websites, or over banners or links from within the Website. These other websites, banners or links may place their own cookies or other files on your computer, collect data or solicit personal information from you subject to such third party's privacy policy. We encourage you to read the privacy policies and other terms of such third parties before accessing or using them.

## **10. 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 [compliance@rynattrading.com](mailto:compliance@rynattrading.com).

## **11. Updates**

The Company will perform a periodical review of this Policy, at least once a year. The Policy is in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this policy. The most up-to-date version of the Policy can be found on our Website.