

PRIVACY POLICY

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Introduction

Welcome to Ghost Whale Index's Privacy Policy.

Your privacy is very important to us.

We have created this Privacy Policy to demonstrate our firm commitment to privacy and security.

Please use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

EU RESIDENTS: YOUR LEGAL RIGHTS

You have the right to:

Request access

To your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction

Of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure

Of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing

Of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing

Of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer

Of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time

Where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

LAWFUL BASIS

Legitimate Interest

Means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract

Means processing your information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation

Means processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Ghost Whale Index Group acting as joint controllers or processors and who are based US and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers [acting as processors] based Ukraine, India, Romania, Sri Lanka, Belarus, Venezuela, Kosovo, Mexic, Argentina, Philippines who provide IT and system administration services.
- Social networking sites [acting as processors] based in the United States to which you have linked your account.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based US an France who provide consultancy, banking, legal, insurance and accounting services.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

Third-party marketing

We will get your express opt-in consent before we share your personal information with any company outside our company for marketing purposes, including service providers who perform marketing services on our behalf.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by:

- Logging into the Website and adjusting your marketing preferences
- Following the opt-out links on any marketing message sent to you
- Contacting us at any time

International transfers

We share your personal information within our company. This will involve, if you are based in the European Union, transferring your data outside the European Economic Area (EEA).

Many of our external third parties are also based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside the EEA.

We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.

Contact Information

If you have any questions about this Privacy Policy or our privacy practices, please contact us.