

# GDPR Privacy Policy

## 1. Data Controller

The Data Controller is INCOME CAPITAL MANAGEMENT s.r.o., operating through the website [www.incomecapital.biz](http://www.incomecapital.biz).

For any questions related to this Privacy Policy or the processing of personal data, users may contact the Data Controller via the contact details published on the website.

## 2. Personal Data Collected

The Company may collect and process the following categories of personal data:

- Identification data (name, surname)
- Contact data (email address, phone number)
- Professional information
- Technical data (IP address, browser type, device information)
- Data provided voluntarily through contact forms or private areas

No sensitive data is collected unless explicitly required by law or provided voluntarily by the user.

## 3. Purpose of Data Processing

Personal data is processed for the following purposes:

- Provision of investment-related information and services
- Access to the private client area
- Regulatory and compliance obligations (KYC/AML where applicable)
- Communication with clients and prospective clients
- Website security and performance monitoring

## 4. Legal Basis for Processing

Data processing is based on:

- User consent
- Performance of a contract or pre-contractual measures
- Compliance with legal obligations
- Legitimate interest of the Company

## 5. Data Retention

Personal data is retained only for the time necessary to achieve the purposes for which it was collected, or as required by applicable laws and regulations.

## 6. Data Sharing

Personal data may be shared with:

- IT and hosting service providers
- Professional advisors (legal, accounting, compliance)
- Authorities where required by law

Data is not sold or transferred for commercial purposes.

## **7. Data Transfers Outside the EU**

Where necessary, data may be transferred outside the European Union, ensuring adequate safeguards in compliance with GDPR provisions.

## **8. Data Subject Rights**

Users have the right to:

- Access their personal data
- Request correction or deletion
- Restrict or object to processing
- Request data portability
- Withdraw consent at any time

Requests can be submitted using the contact details available on the website.

## **9. Data Security**

The Company implements appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or misuse.

## **10. Changes to This Policy**

This Privacy Policy may be updated from time to time. Any changes will be published on the website.