

Privacy Policy

The Company respects every individual's right to privacy. We value our relationship with you and take pride in the mutual loyalty and respect shared with each client. These provisions apply to both former and current clients. Please familiarize yourself with the following information.

General Provisions

1.1 This Privacy Policy is an integral part of the publicly disclosed documents under which SSHY (hereinafter referred to as "the Company") provides services to its Clients.

1.2. By choosing the Company's services, the Client fully agrees to all terms and conditions set forth in the publicly disclosed documents. This applies throughout the entire period of the Client's interaction with the Company, including—but not limited to—the use of informational materials of any kind, and payments or money transfers. Should the Client disagree with any provision of the documents publicly disclosed by the Company, they must immediately cease all interaction with the Company. If the Client finds the provisions described in this Privacy Policy unacceptable for any reason, they must immediately cease all interaction with the Company, including the execution of financial transactions through the Company.

1.3. A key priority for the Company is the relationship between the Company and its Clients. The Company maintains loyalty and respect for each individual Client, guaranteeing absolute security and total confidentiality.

1.4. This Privacy Policy employs the following key terms and definitions:

1.4.1 Privacy (information confidentiality) is the legal right of a natural or legal person to withhold the disclosure of information (data) that is personal, private, or confidential in nature, or that constitutes a trade secret. In the relationship between the Client and the Company, confidentiality entails the Company's obligation to ensure the security and non-disclosure of information (data) regarding the Client that the Company obtains during the provision of services to the Client.

1.4.2 Personal (private) information of the Client is information that characterizes, identifies, or verifies the Client, or reveals certain details regarding their personality, financial status, preferences, and wishes. The concept of personal information is explained in greater detail in the text of this Privacy Policy.

1.4.3 The Privacy Policy is a set of measures, procedures, and actions aimed at ensuring the collection of complete, accurate, and authentic information about the Client; guaranteeing the security and integrity of such information; and providing said information to state (regulatory) authorities in the manner and within the timeframes prescribed by applicable law and the terms of this Privacy Policy.

Personal Information

2.1. Upon opening and maintaining a live or demo account with the Company, the Company collects and processes various information regarding the Client. The purpose of this procedure is to assess the Client's financial needs most effectively, process the Client's requests and transactions, inform the Client about products and services that may be of interest, and provide the Client with efficient, high-quality service. Such information may include the following:

2.1.1. Registration information: information provided by the Client to the Company in applications, forms, and other types of documents (including electronic ones). Examples include: first name, middle name (if applicable), surname, contact details (postal address, telephone number, email address, etc.), date of birth, occupation, net worth, and income.

2.1.2. Operational information: information regarding transactions executed by the Client, as well as information concerning communications (two-way or one-way) between the Client and the Company or between the Client and parties related to the Company. Examples include: account balances, operational activity, requests, inquiries, orders, Client demands, and the Company's responses thereto, including the text of correspondence or logs of communications via instant messaging systems. "Related Parties" refers to natural or legal persons who provide assistance to the Company and/or the Partner in connection with the provision of services by the Company, pursuant to an agreement with the Company.

2.1.3. Verification information is information required to identify the Client. Examples include a passport or driver's license (or, for a legal entity, incorporation documents). This type of information also includes data obtained by the Company from various sources, such as credit bureaus, information and address agencies, and other third-party services. The Anti-Money Laundering Policy requires the Company to collect information and take necessary measures to prevent the conversion and legalization (laundering) of funds of questionable origin. In certain cases, the Company reserves the right to request documentation from the Client verifying the source of funds.

2.2. The list above is not exhaustive. The Company reserves the right to request additional information from the Client if necessary to comply with applicable laws and regulations.

About "cookies"

3.1. Cookies are small files containing information that a web server (website) uses to track its visitors. The Company may set and access cookies on the Client's computer, thereby collecting information regarding which advertisements and resources attract (direct) users to the Company's web server (site). The Company (or any of its divisions) may use cookies to assess the Client's interest in its products and services and to track the Client's activity on the Company's web server (website). The information that the Company collects and provides to its Related Parties is anonymous and is not associated with any specific Client.

Security technologies

4.1. The Company uses secure connection technology (SSL, Secure Socket Layer) to protect information provided to the Company by Clients. This technology protects information against potential interception by third parties during transmission via communication channels (in both directions). The Company strives to ensure that its web servers (sites) are secure and comply with industry standards. The Company also employs other security measures — such as firewalls, authentication systems (e.g., passwords and personal identification numbers), and access control mechanisms—to monitor for any unauthorized access attempts regarding systems and data.

4.2. The Company reserves the right, at its sole discretion, to select data protection technologies and mechanisms and to cooperate in this regard with counterparties it deems trustworthy.

4.3. In accordance with the recommendations of the Payment Card Industry Security Standards Council, transport-layer encryption (TLS 1.2 and TLS 1.3) is used to protect Client payment data, while the AES algorithm with a 256-bit key length is used at the application level.

Sharing information with the Company's related parties

5.1. The Company may disclose or share the personal information of its Clients—as described earlier in this Privacy Policy—with its Related Parties for business purposes, such as maintaining client accounts and providing information on new products and services. All actions taken by the Company are carried out exclusively in compliance with applicable law.

Sharing information with third parties

6.1. The Company may also disclose the Client's personal information to third parties at the Client's request in order to fulfill the Client's instructions (orders, requests). The Company also notifies Clients that, under no circumstances, does it sell, temporarily transfer, rent, distribute, reproduce, or publish the Client's personal (private) information.

Disclosure of information to regulatory bodies

7.1. In exceptional cases, the Company may provide the Client's Personal (private) information to third parties if permitted by applicable laws and regulations. The Company may disclose the Client's personal (private) information to law enforcement and other regulatory authorities in compliance with court orders or in response to other official requests, and as necessary to protect the Company's own rights or legitimate interests.

7.2. The Company will not use the Client's Personal (private) information for any purpose other than those described in this Privacy Policy, unless the Company expressly specifies how such information will be used at the time the Client provides it, or the Company obtains specific authorization from the Client.

Refusal to provide information

8.1. The Client has the right to refuse to provide personal (private) information to the Company. However, the Company warns that such a refusal may result in the Company being unable to fully and efficiently provide account opening and maintenance services, or to provide the Client with any other type of service. While the Company strives to offer its Clients service based on the most accurate, complete, and up-to-date information available regarding them, the Client can greatly assist the Company in this regard by promptly notifying the Company of any changes to their personal information.

8.2. If the Client does not wish to disclose their personal (private) information to third parties in accordance with this Privacy Policy, they must contact the Company by sending an email to support@sshy.tech.

Changes and Additions

9.1. The Company reserves the right to make changes and additions to this Privacy Policy, particularly if a legal rule arises requiring such changes or additions.

9.2. Procedure for making changes and/or additions:

9.2.1 In the event that changes and/or additions are made, the Company shall notify the Client by publishing a corresponding notice on the Company's official website and sending an email message.

9.2.2 The publication of the corresponding notice on the Company's website and the sending of email bulletins shall be deemed notification to the Client regarding the changes and/or additions, regardless of whether the Client has read the relevant text or ignored it.

9.2.3 Changes and/or additions to the document shall enter into force 5 (five) calendar days after the date of publication of the notice on the Company's website; prior to the expiration of this period, the notice shall be purely informational in nature.

9.2.4 In the event that a legislative rule is introduced requiring a change and/or addition to this Privacy Policy, said legislative rule must be applied immediately upon its entry into force, regardless of whether the corresponding changes and/or additions have been made to the document. Provisions of this Privacy Policy that contradict the new rule shall cease to be effective until the corresponding changes and/or additions are made to said document.

Acceptance of conditions by the Client

10.1. The Client accepts the Privacy Policy upon using the Company's services, software, and/or hardware provided by the Company.

10.2. The Client agrees to all provisions (clauses, sections) of the documents publicly declared by the Company throughout the period of use of any Company service; in the event of disagreement, the Client is obliged to immediately notify the Company of the termination of the use of the services.