

# WRE Privacy Notice

## Summary

This Privacy Policy describes how WRE processes Personal Data pertaining to natural persons that interact with it as website visitors or Prospect Customers/ Customers (meaning how such Personal Data is: Collected; Stored; Accessed; Processed and Shared) both online and by other means, such as by phone while Customers; as well as which are the Lawful Basis towards such Processing activities.

The primary and exclusive goal of Processing Personal Data is to identify and aid Customers who have been target of "scam" actions with their investment recovery efforts.

At an earlier stage (while reaching out to prospects), WRE will gather the minimum amount of Personal Data that allows enticing contact with the Data Subject under Legitimate Interest that derives from the GDPR Article 14 ruling.

Once the Data Subject becomes a WRE Customer he/she will sign a contract, hence the Lawful Basis for Processing his/ her Personal Data is the existence of a Services Contract.

Nevertheless, the Data Subject maintains full control over the Personal Data that pertains to him/ her as well as the Personal Data Processing Activities undertaken by WRE (as defined under the European General Data Protection Regulation [GDPR] as Data Subject's Rights and also the rights described under the California Consumer Protection Act [CCPA]).

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## **Applicability**

WRE reserves the right to modify this Privacy Policy at all times by posting an updated version on its website. The version is timestamp indexed, while identified by the Data at the very beginning of this document after the title "Privacy Notice".

## **Use of Information**

WRE Processes Personal Data for the following purposes:

- Reach out to Prospects while briefly introducing "purpose" and "scope" of WRE Services and Personal Data Processing Activities;
- Provide, maintain, and improve its services;
- Process transactions, and to forward the Data Subject related information (e.g. invoices);
- Respond to the Data Subject's comments, questions, and requests, and provide needed Consulting/ Coaching towards its Customers (legal and operational);

## **I. Data Collection**

WRE Processes Personal Data pertaining to those Data Subjects who have either freely submitted it upon signing a contract and therefore having become WRE Customers.

Or, at an earlier stage, WRE may gather the minimum amount of Personal Data that allows it to entice contact with a Data Subject that may be a potential Customer. In such case, WRE strictly observes by the GDPR Article 14 ruling, making explicitly known to the Data Subject WHICH Personal Data it has gathered pertaining to him/ her and WHAT has been the source, plus the "purpose" and "scope" of its Personal Data Processing Activities (on-going and to be if the Data Subject becomes a Customer), all of this while fully observing the Principle of Data Minimization.

As defined under the GDPR Article 14 if either the Data Subject provides no feedback or he/she declines the approach/ contact, WRE shall erase the Personal Data that it has gathered until 1 month after collection date.

To prevent further contact within the same scope, the "Data Subject's" Name and e-mail address will be "blacklisted" (therefore maintained by WRE) on a dedicated repository that is accessible to relevant internal Departments only.

Personal Data pertaining to any one Prospect Customer that is identified as being under 18 years of age (therefore not bearing full legal capacity as an adult) will be automatically excluded from WRE repositories. This also comprehends the unlikely event of a Data Subject who is under 18 years of age but has been identified as an adult by error/ mistake/ his/ her own conduct. Such a scenario will render the services contract null and inherent Personal Data shall be immediately erased from WRE repositories.

Additionally, if there would be the unlikely case of having a minor Personal Data under Processing, WRE will inform the appropriate Supervisory Authorities of the entire "incident".

Upon the collection of Personal Data pertaining to Customers (during the contract signature process), WRE will univocally identify the Data Subject (Customer) by asking for a copy of a legal document. Once the identification has taken place, such digitalized copy (image) of that legal document shall be destroyed.

## **II. Who is the Data Controller of your data?**

Wealth Recovery Experts, a limited company established in Israel is the entity that acts as the Data Controller for the purpose of this Privacy Policy and all data processing practices herein contemplated. All questions or requests regarding the processing of the personal data under our control or processing may be addressed to [info@wealthrecoveryexpert.com](mailto:info@wealthrecoveryexpert.com)

DPO contacts  
Mr. Rui Serrano  
Country: Portugal, European Union  
email – phrdpoaas@gmail.com

## **Cookies.**

WRE' website does not use any cookies or other forms of automated Personal Data Processing and/ or user interaction track and tracing.

## **III. What data do we process?**

### **Personal Data.**

WRE processes the Categories of Personal data:

- Identification Data: First and last name, email address, legal document, full address;

- Processual Data: Entity that has committed the scam, details of the scam, lost investment amounts, interactions, legal counseling and conveyed procedures, communications exchanged with the scammer, inherent dates;
- Payment and invoicing Data: credit card number (optional), payment transactions, banking information;

WRE will assess the complaint of its customer and define actions under specific applicable legislation and inherent sequence that is most likely to produce the intended goal of having the lost investment returned to that Customer. The Customer is the one who exclusively interacts and may potentially share Personal Data that pertains to him/her with any 3<sup>rd</sup> parties that may be deemed relevant for the process of invested assets/ losses recovery.

### **Sensitive personal data.**

Driven from its Service scope, WRE end up inevitably having to process Personal Data that is deemed Sensitive under the GDPR Article 9 (e.g. financial information, misleading conduct by a 3<sup>rd</sup> party that has affected the Data Subject in terms of effective loss), however the company undergoes such processing activities under the strictest confidentiality while assuring the Security of such Personal Data under processing.

### **IV. For what purposes do we process your data?**

Personal Data is exclusively processed by WRE under the scope of rendering its support services which has been contracted by the Customer (Data Subject to whom such Personal Data Pertains to) under the Lawful Basis of a Contract between both parties.

WRE does not perform any type of Automated Personal Data Processing activities or Decision Making, mainly (yet not exclusively) that may lead to "Profiling" activities.

Personal Data pertaining to a former Customer shall be erased from WRE repositories once all applicable legal timelines have expired being that if those are dilated in time (meaning over 1 year after service termination), the Personal Data shall be securely segregated from live Data.

Where the Data Subject exercises his/ her Right to Erasure (as determined under the GDPR article 17, and unless WRE has a valid legal reason not to observe such right (in which case that shall be informed to the Data Subject), the Data shall be erased within the maximum period of 5 work days.

### **The Principle of Data Minimization.**

WRE takes every reasonable step to ensure that Personal Data under its direct Processing activities (as the Controller) is absolutely limited to the amount and type that is necessary to deliver its Services towards its Customers, as it has been agreed with those over the establish Services Contract, and not to be maintained over any redundant repositories nor for any longer than required under the scope of such agreed services (Service Lifecycle and Legal Requirements/ applicable time frames).

## **V. What third parties can receive my data?**

### **Third-Party Recipients.**

WRE exclusively resorts to Pipedrive as the main Operational Support tool/ Corporate ERP and CRM and Intercom as the voice communications tool which allows the recording of phone calls. Both these partners act as Processors, nevertheless none of those partners proceed with Personal Data Processing activities outside of the scope of their Processor role under WRE Services, as per ruled by Data Processing Agreements (DPA) to be in place between WRE and those partners.

Besides what has been hereinabove mentioned, WRE does not share Personal Data pertaining to its Customers with any 3<sup>rd</sup> party entities.

## **VI. International Data Transfers and Safeguards Employed**

The DPAs have the Standard Contractual Clauses defined and sanctioned by the EU/ EEA.

## **VII. Retention periods**

### **General Retention Criteria.**

As herein above mentioned, WRE will maintain Personal Data pertaining to its Customers for the duration of the Services plus as per Legal requirements (e.g. invoices must be maintained by Law for 7 years after document date).

In case of a potential legal dispute or for the period allowed by local legislation (in the geography where the Customer is located) after the Services Contract has come to an end, WRE reserves itself the right under Legitimate Interest to maintain Personal Data that exclusively is relevant to allow legal defense; all other Personal Data shall be erased.

## **VIII. Storing of Personal Data**

WRE is a Digital company, which means that the overwhelming amount of Data and information the company requires to operate is exclusively maintained under Digital format on IT Systems.

WRE stores all Personal Data over the following 3<sup>rd</sup> party SaaS tools:

- Pipedrive
- Intercom
- Google mail (Corporate Account)

WRE acts as the Controller and these “Partners” as “Processors”, meaning they will not undergo any “Personal Data Processing Activities” activities towards information registered, submitted or conveyed by WRE unless under the scope of contracted services and that is agreed and documented under an existing “DPA” between the parties.

## **IX. Rights of Data Subjects**

Under the GDPR, the Data Subject has the following set of established rights:

**Right of access.** The right to obtain from the Controller confirmation as to whether his/ her personal data is being processed, and, where that is the case, access to such personal data as well as related information. WRE will share the Personal Data over a secure channel, and that (depending on the type of Data as well as volume) may imply the need to convey a “password” via an alternative communication channel to the Data Subject to ensure authorized secure access. Customers may exercise this right by reviewing information on WRE’s website user account area or by submitting a request as per herein defined ahead in this document which is the application process for those Data Subjects who are not WRE Customers.

**Right to rectification.** The right to obtain the rectification of inaccurate Personal Data pertaining to that Data Subject. Customers may directly amend existing information on WRE’s website user account area or by submitting a request as per herein defined ahead in this document which is the application process for those Data Subjects who are not WRE Customers.

**Right to erasure.** The right to have Personal Data pertaining to him/ her that is under Processing by WRE erased and therefore Processing stopped, unless a legal duty or have a legitimate ground to retain certain data prevents WRE from observing such right, in

which case the Data Subject shall be duly informed. This right may be exercised by submitting a request as defined in the procedure stated below in this section.

**The right to restrict processing.** Under relevant conditions set out by the law, the right to request and have in place processing restrictions (in scope and purpose) towards Personal Data that pertains to him/ her. When exercising this right, the Data Subject must be specific about which processing activities are being requested to be restricted and the Controller shall provide feedback to the Data Subject on either the completion of the request or any potential collateral impact that may derive from implementing the requested objection to Processing, asking for additional confirmation prior to implementing the request. This right may be exercised by submitting a request as defined in the procedure stated below in this section.

**The right to object to processing.** The right to object to processing activities that have been qualified under this Privacy Policy has occurred under the Lawful Base of Legitimate Interest by the side of WRE. The exercise of this right may also occur where the Data Subject wishes to opt-out from an existing Service (and not necessarily canceling the Service). When exercising this right, the Data Subject must be specific about which processing activities are being requested to stop and the Controller shall provide feedback to the Data Subject on either the completion of the request or any potential collateral impact that may derive from implementing the requested objection to Processing, asking for additional confirmation prior to implementing the request. This right may be exercised by submitting a request as defined in the procedure stated below in this section.

**Right to data portability.** The right to receive the Personal Data pertaining to that Data Subject, in a structured, commonly used and machine-readable format as well as the right to transmit such Personal Data to another controller without hindrance. WRE will share the Personal Data over a secure channel, and that (depending on the type of Data as well as volume) may imply the need to convey a "password" via an alternative communication channel to the Data Subject to ensure authorized secure access. Customers may directly amend existing information on WRE's website user account area or by submitting a request as per herein defined ahead in this document which is the application process for those Data Subjects who are not WRE Customers.

**Right to be informed about a Personal Data Breach.** The Data Subject has the right (and it is the Controller's obligation by law to ensure it) to be informed of any unauthorized disclosure or potential disclosure of his/ her Personal Data to unauthorized 3<sup>rd</sup> parties within 72 hours of its occurrence.

**Right to lodge a complaint with a supervisory authority.** The right to lodge a complaint regarding WRE's Processing activities over his/ her Personal Data towards any of the EU Member States data protection Supervisory Authorities. WRE is however also available to provide any clarification towards those Data Subjects who may feel that it's Processing of the Personal Data that pertains to them has negatively impacted them or somehow breached their rights under GDPR and/ or the right to Privacy, having such Personal Data processed in a secure manner and Confidentiality assurance. Data Subject may submit a complaint via the request process as per herein defined ahead.

## **Submitting a Data Subject Request/ Complaint.**

Under the scope of Personal Data Protection, the Data Subjects may address WRE via:

- an e-mail to [info@wealthrecoveryexpert.com](mailto:info@wealthrecoveryexpert.com)

The exercise of Data Subjects' rights as some other "interactions" requires the univocal identification of the person submitting such request as being, in fact, the Data Subject to whom such Personal Data pertains to, hence WRE may have to set in place a process or mechanism that allows it to document having undergone such assertive identification.

## **X. Miscellaneous**

**Links to 3rd Party Sites.** Our Websites may eventually include links to other websites whose privacy practices may differ from those of WRE. If you submit personal data to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

**Our Contacts.** You may contact us for any reason in connection with this Privacy Policy at [info@wealthrecoveryexpert.com](mailto:info@wealthrecoveryexpert.com)

## **XI. Glossary**

"Agreed Services" or "Services" means those Services being rendered by the Controller towards the Data Subject towards which he/ she has agreed with and/ or comprehending Processing legitimacy that derives from an existing and documented Lawful Base.

"Controller" means the "Party" which determines the "scope", "purpose" and form of Personal Data Processing activities.

"Data Subject" means the identified or identifiable natural person to whom "Personal Data" relates. Both Parties understand that the "Data Subject" is the sole owner of "Personal Data" which pertains to him/ her.

"Data Subjects' Rights" means the rights established towards the "Data Subjects" under "GDPR".

"GDPR" means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the



"Personal Data" Treatment" and on the free movement of such data, while replacing the Directive 95/46/EC and having become enforceable on May 25th, 2018.

"IT Landscape" means the set of IT assets and services of and at the disposal of either the Data Subject, WRE or its Partners that enables their Personal Data Processing to occur, meaning the communications infrastructure (LAN, WAN, Wi-Fi networks), Data Center and technical rooms, Cloud-based services, workstations, software systems and tools, mobile devices in use, peripheral IT devices, Firewalls and web-based resources.

"Lawful Basis" means the enlisted lawful grounds that a Controller has to entice Personal Data Processing activities under "GDPR", namely (but not limited to) having documented: the Data Subject' Explicit Consent towards those Personal Data Processing activities; the Controller' Legitimate Interest in proceeding with those activities; accessory legal obligations that the Controller must observe and which entitled it to proceed with such activities within the limits of GDPR ruling and inherent obligations.

"Partner" means any 3rd party entity towards which the Controller may resort in order to ensure Personal Data Processing activities under an established Lawful Base (as defined under the "GDPR") and within the scope of agreed Services with the Data Subject.

"Personal Data" means any data which by itself or when cross-referenced with other data enables one to univocally identify a specific natural person, the "Data Subject".

"Personal Data Processing" means any operation or set of operations which is performed upon "Personal Data", whether or not by automated means, such as: collection/retrieval; accessing (consultation, use); processing (organization, structuring, adaptation or alteration); storage (recording, erasure or destruction); sharing (disclosure by transmission, dissemination or otherwise making available, publishing).

"Personal Data Breach" means any "event" or "incident" (as per ITIL definition) which enables the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to "Personal Data".

"Processor" means the entity which proceeds with authorized Personal Data Processing activities on behalf of the "Controller".

## **Contact Us**

If you have any questions about this privacy policy, please contact us by email at [info@wealthrecoveryexpert.com](mailto:info@wealthrecoveryexpert.com)