Privacy Policy

1. WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy applies to the personal data that We collect and process acknowledging and understanding that Your privacy is important to You and that You care about how Your personal data is collected and processed. We at Etrionis (herein after referred to as **Company**) are dedicated to safeguarding and preserving Your personal data and privacy when visiting Our Websites, utilizing Our services, products or communicating electronically with Us. For the purposes of the data protection laws that apply to us, including the GDPR which is the European General Data Protection Regulation We act as the Data Controller for the personal data that We collect and process to enable You to make use of Our Services. The purpose of this Privacy Policy is to transparently provide You with an explanation as to the legal basis for Us collecting and processing Your personal data, the categories of personal data that We may collect about you, what happens to the personal data that We may collect, where We process Your personal data, how long We are required to retain Your personal data, who We may share Your personal data with and to also explain Your rights as a data subject. We do update this Privacy Policy from time to time and will post all updates to Our Website as and when issued. Please review this policy regularly on Our Website for any changes.

2. DEFINITIONS AND INTERPRETATIONS

In this Privacy Policy the following terms shall have the following meanings:

Cookie
means a small text file placed on Your computer or device by Our Websites when You visit certain parts of Websites.

GDPR
means the General Data Protection Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC, UK Data Protection Act 2018 as amended, replaced or superseded and in force from time to time and as transposed into member-state legislation.

Privacy Policy
means this Privacy Policy updated from time to time and made public on Our Website https://etrionis.com

Personal Data
means any information which relates to an identified or identifiable natural person. An identifiable person is one who can be identified directly or indirectly in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Website
means the website https://etrionis.com , which is owned by the Company as defined.

Services
mean all Our Services described on the Website.

You? Your
You, as User or Guest, depending on your status at the Website.

We, Us, Our
refers to WHITE STONES MANAGEMENT LTD, registered under the number HE 428792 in accordance with the legislation of Cyprus republic, with the address: Andrea Paraskeva, 44, Strovolos, 2024, Nicosia, Cyprus (Brand name –Etrionis).

3. YOUR DATA PROTECTION RIGHTS
Under the GDPR you, as a data subject, have certain rights over the personal data that We hold and process.
At Etrionis We are committed to make it easy for You to exercise these rights in the most transparent manner possible. You can exercise any of Your rights in relation to the data that Etrionis holds about you, by contacting Our data protection officer through the email address provided at the end of this section or through Your personal user cabinet.
The following are the specific rights You have over Your personal data We hold and process, namely:
a. The right to be informed about Our collection and processing of Your personal data including without limitation the legal basis for the collection and processing, the categories of data, the methods of data use, the envisaged period for which the personal data will be retained. This Privacy Policy should tell You everything You need to know, but You can always contact Us to find out more or to ask any questions.
b. The right to access Your personal data We collect about you, commonly referred to as "Subject Access Requests", which provides you, as the data subject, the right to obtain a copy of Your personal data that We are processing for You Pursuant to GDPR We are required to respond without undue delay to all Subject Access Requests in practice this means We have to respond within 1 month of receipt of the Subject Access Request. Ordinarily Subject Access Requests are free of charge. We may extend the time period for responding to a Subject Access Request by a further two months and may charge a reasonable fee if We deem the request to be manifestly unfounded or excessive, however, We are required to advise You of Our intention to do this within 1 month of Your subject access request. Should You wish to make a Subject Access Request this can be done by contacting the Company using the email: support@etrionis.com

c. The right to have Your personal data rectified if any of Your personal data that We collect and process is in any way inaccurate or incomplete.

d. The right of erasure (otherwise known as "the right to be forgotten"), i.e. the right to ask Us to delete or otherwise dispose of any of Your personal data that We process. Please note that this is not an absolute right and We may not be able to comply with Your request as We may be legally obliged to continue to retain Your personal data for a specific period

e. The right to restrict (i.e. prevent) the processing of Your personal data by us.

f. The right to object to Us processing Your personal data for a particular purpose or purposes. Please note that the right to object only applies in certain circumstances and will depend on the purposes or legal basis for the processing.

g. The right to data portability. This only applies where You have provided personal data to Us directly, the legal basis for Us processing Your personal data is i) consent or ii) for the performance of a contract and We are processing Your data using automated means. In such instances You have the right to receive Your personal data (or request that We transfer it to another Controller) in a structured, commonly used and machine-readable format.

h. Rights relating to automated decision-making and profiling. We do not use Your personal data in this way.

i. The right to lodge a complaint with any relevant Data Protection Authority, in particular in the member State of Your residence, place of work or the place of processing Your personal data.

Data Subject Request
The right to be informed
The right of access
The right to rectification
The right to erasure
The right to restrict processing
The right to data portability
The right to object Rights in relation to automated decision making and profiling.

j. If You wish to exercise any of the aforementioned rights, please contact Us. We request that in the first instance You contact Our data protection officer at any time on support@etrionis.com.

k. We promise to promptly consider Your request and to respond to You in accordance with the requirements of GDPR. If you're unhappy with our responses You may make complaint to the Financial Ombudsman of Cyprus - website: https://www.financialombudsman.org.cy

4. PERSONAL DATA WE COLLECT ABOUT YOU
4.1. PRINCIPLES OF PROCESSING
During collecting and processing the personal data, the Company adheres the principles as follows:

j. Lawfulness, fairness and transparency
Lawfulness – the controller identifies a lawful basis before processing the personal data (for example consent). Fairness – in order to process fairly, the controller has to make certain information available to the data subjects as practicable. This applies whether the personal data was obtained directly from the data subjects or from other sources. Transparency – any information and communication relating to the processing of the personal data be easily accessible and easy to understand, and that clear and plain language be used.

k. Purpose limitation
The personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

l. Data minimization
The personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

m. Accuracy
The personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

n. Storage limitation
The personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, if only are implemented appropriate technical and organizational measures required by governing law in order to safeguard the rights and freedoms of the data subject.

o. Integrity and confidentiality

The personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

4.2. LEGAL BASIS FOR COLLECTING AND PROCESSING PERSONAL DATA

Etrionis will process Your personal data based on legal bases such as:

a. the performance of Our contract with You (i.e. the provision of Our Services to you);

b. our legitimate business interests (i.e. for fraud prevention, maintaining the security of Our network and services, seeking to improve the Services that We provide and Your interaction with us). Whenever We rely upon this lawful basis, We assess Our business interests to make sure that they do not override Your rights. Furthermore, in some cases You have the right to object to this processing;

c. with Your consent for direct marketing purposes so that We may keep You fully up to date with other products and services that We supply and think may be of interest to you. Where We rely upon consent, We will need Your explicit consent, which may be removed at any time;

d. our legal obligation.

4.3. CATEGORIES OF THE PERSONAL DATA WE COLLECT

A summary of the Personal Data that We process, when We collect it, how We use it and why We use it (i.e. the legal basis for processing) is listed below:

Personal Data	**When We Collect**	**How We Use**	**Why We Use**
Email	In registration procedure, in event registration	Use email to restore Your account. We use it to notify You about changes to Our Terms or Privacy Policy; to communicate with you	Necessary for the performance of a contract with you
Information about Your transactions	When You do the transaction	We use it for make transactions. All transactions are carried out using third-party services	Necessary to comply with a legal obligation

5. PROTECTING YOUR PERSONAL DATA AND DATA RETENTION

We use, store and process Your personal data on Etrionis servers. By filling a “consent application” You agree to these conditions of collection, processing, transfer and storing Your personal data. When We process Your personal data for one of the legal bases specified in this Privacy Policy, We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. Etrionis protects Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Etrionis use are firewalls and data encryption, physical access controls to Our data centers, and information access authorization controls. Etrionis also authorizes access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. The Etrionis staff is trained on procedures for the management of personal information, including limitations on the release of information. Access to personal information is limited to those members of Our staff and contractors whose work requires such access. Etrionis conducts periodic reviews to ensure that proper information management policies and procedures are understood and followed. All of Our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations.

5.1. HOW WE PROTECT YOUR DATA

When You provide Your personal data through Our Website, KYC portals, Our applications, this information is transmitted across the internet securely using industry standard encryption. Your personal data is held encrypted on secure servers. Where any third parties process Your personal data on Our behalf, We require that they have appropriate technical and organizational measures in place to protect this personal data and We will also ensure that it is GDPR compliant. Data Processing Agreement is in place between Etrionis and the third party so that both parties understand their responsibilities and liabilities pursuant to GDPR.

5.2. HOW YOU CAN PROTECT YOUR PERSONAL DATA

When You create Your account, choose a strong password that is unique to this account. Do not share Your password with other people. Using the same password across Your different accounts will increase the risk of Your data being compromised if Your password is accidentally or unlawfully accessed by unauthorized persons. If You suspect that someone else has got access to Your password, make sure that You change it immediately. When using Our wallets, ensure You keep Your passphrases and keys in a secure device isolated from devices You use regularly. Do not share the device containing Your passphrases and keys with friends, family members or even people You trust.

5.3. DATA RETENTION

Your personal data will be retained for as long as necessary to satisfy the purposes We received it for, this includes regulatory and business purposes.

In determining the necessary personal data retention period, the following factors are considered:
a. The amount of personal data as We aim to minimize this amount to the extent possible for each specific purpose specified in Section 4 of this Privacy Policy.
b. The nature of the personal data depends on the exact purpose which this specific personal data serves as detailed in Section 4 of this Privacy Policy.
c. The sensitivity of the personal data by its nature and substance.
d. The potential risk of harm from unauthorized use or disclosure of Your personal data and We continue to run risk assessments and risk mitigation activities to minimize this potential risk including engagement of third-party specialized data management and data protection providers.
e. The purposes for which We process Your personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

6. THIRD PARTY LINKS

You may find links to third party Websites on Our Website or chats of users contained on Our Website or mobile applications. These Websites should have their own privacy policies which You should check. We do not accept any responsibility or liability for their policies whatsoever as We have no control over them.

7. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We do not share Your Personal Data to third Parties, except cases that are mentioned in this Privacy Policy.

7.1 WITH YOUR CONSENT

We will share information with companies, organizations or individuals outside of Etrionis LTD when We have Your explicit consent.

7.2 TO COMPLY WITH THE LAW

We may share information in response to a request for information if We believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, We will attempt to provide You with prior notice before disclosing Your information in response to such a request.

7.3 IN AN EMERGENCY

We may share information if We believe that it is necessary to protect the vital interests of the data subject (i.e. to prevent imminent serious physical harm or death to a person.)

7.4 TO ENFORCE OUR POLICIES AND RIGHTS

We may share information if We believe Your actions are inconsistent with Our user agreements, rules, or other Etrionis policies, or to protect the rights, property, and safety of ourselves and others.

7.5 WITH OUR AFFILIATES

We may share information between and among Etrionis and any of Our parents, affiliates, subsidiaries, and other companies under common control and ownership.

7.6 WITH OUR PARTNERS

We may share information with vendors, consultants, and other service providers (but not with advertisers and ad partners) who need access to such information to carry out processing activities for us. The partner's use of personal data will be subject to appropriate confidentiality and security measures. We may share Your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use Your private personal data only on Our behalf and pursuant to Our instructions. We may share Your private personal data with our partners to make a transaction. Where any third parties process Your personal data on Our behalf, We require that they have appropriate technical and organizational measures in place to protect this personal data and We will also ensure that it is GDPR compliant. Data Processing Agreement is in place between Etrionis and the third party so that both parties understand their responsibilities and liabilities pursuant to GDPR.

7.7 INTERNATIONAL TRANSFERS OF PERSONAL DATA

Data Subjects risk losing the protection of GDPR if personal data is transferred outside of i) the EEA and accordingly GDPR restricts such transfers, unless the rights of data subjects in respect of their personal data is protected by appropriate safeguards or one of a limited number of exceptions applies (such exceptions include Your explicit and informed consent). Etrionis will not make any international transfers of Your personal data unless it has i) Your explicit and informed consent or ii) it has put in place the appropriate safeguards or iii) the international transfer is covered by an exception.

7.8 ADVERTISING, ANALYTICS AND BUSINESS PARTNERS (LIMITED TO NON-PERSONALLY IDENTIFIABLE INFORMATION)

We may share aggregated or pseudonymous information (including demographic information) with partners, such as publishers, advertisers, measurement analytics, apps, or other companies. For example, We may tell an advertiser how its ads performed or report how many people installed an app after seeing a promotion. We do not share information that personally identifies You (personally identifiable information is information like name or email address) with these partners, such as publishers, advertisers, measurement analytics, apps, or other companies.

7.9 OTHER INFORMATION

Other information that does not personally identify You as an individual is collected by Etrionis (such as, by way of example, patterns of use) and is exclusively owned by Etrionis. We can use this information in such a manner that Etrionis, in its sole discretion, deems appropriate. We may share specific aggregated, non-personal information with third parties, such as the number of users who have registered with us, the volume and pattern of traffic to and within the site, etc. That information will not identify you, the individual, in any way. We shall not use Your email or other contact information for sending of commercial proposals, other marketing needs, without Your prior consent. In the light of the above, when You send Us messages, We can keep them for administering Your inquiries, for improving Our services. We shall not transfer information from such messages to third parties.

USE OF COOKIES

To enhance the quality of Our services, provide You with relevant content as well as understanding how You use Our Website and applications, We use technologies, such as Cookies. Cookies do not typically contain any information that personally identifies you, but personal information that We store about You may be linked to the information stored in and obtained from Cookies. We use Strictly Necessary Cookies - these are required for the operation of Our Website. They include User session key, browser language. This is a temporary key issued to the User after the successful logging in. These cookies are used to enable You to log into secure areas of Our Website.

CHILDREN'S PRIVACY

Our platform is not intended for individuals under 18, and we do not knowingly process minors' data.

CONTACTING US

We welcome any queries, comments or requests You may have regarding this Privacy Policy. If You wish to make a subject access request, please do not hesitate to contact Us at support@etrionis.com.

CHANGES TO THIS PRIVACY POLICY

Any changes that We make to Our Privacy Policy in the future will be posted on Our Website. Where appropriate, We will notify You of the changes when You next visit Our Website. This Privacy Policy was last updated on November 10, 2026.