



Privacy Policy

We last updated our Privacy Policy on 22nd August 2022.

This Privacy Policy outlines the rules, regulations and practices that manage any third-party data. The Privacy Policy outlines how the Company collects, uses and discloses personal information. It also tells You about Your privacy rights and how the law protects You.

The “Terms of Use” available at <https://www.amraadvisory.com> are an integral and inseparable part of this Privacy Policy.

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I. Managing your data

A. Who is responsible

This platform is owned and maintained by AMRA Advisory AB.

We are responsible for collecting and adequately managing any information you submit.

We will keep your details secure and use the information you provide consistently with applicable privacy and data protection laws and the terms of this Privacy Policy.

B. How do we update this privacy policy?

This privacy policy was last updated on 22nd August 2022.

We keep our privacy policy under regular review and will replace any updates on our Platform.

C. What Information do we collect?

When subscribed to our Services or newsletters, our subscribers may have access to AMRA Advisory Partner Platform (circle.so) and associated systems; we may process additional data items in this instance. Please refer to Circle Privacy Policy our "Terms of Use" for further details.

Here are the types of personal information we collect:

- **Information You Give Us:** We acquire and store the information you provide to US. You can choose not to provide specific details, but then you may not be able to take advantage of all of our website features.
- **Automatic Information:** We automatically collect and store information about your use of our Services.
- **Additional Information:** Like many other websites, we use "cookies" and other unique identifiers when your browser or device accesses AMRA website. We do this by using cookies (see section 7 below).

We never process Personally Identifiable Information (PII) or Sensitive Personal Information (SPI) of data subjects under the age of 18 years. If you think that such data is being processed by AMRA Advisory or suspect that an underage user is engaged in our platforms, please contact anna@amraadvisory.com immediately. We will investigate further.

D. How do we use your information?

We may use the information you provide us in several ways, for example,

- i. to deliver a focused product delivery;
- ii. to provide you with the information and Services you ask for and honor any contract you have with us;

- iii. for statistical purposes when we evaluate our range of services.
- iv. to personalise repeat visits to our website.
- v. to tell you about other products and services we think may be of interest to you (see section 5 below)
- vi. to manage customer service enquiries.

E. Examples of Information Collected

Purpose	Legal ground
email addresses	
<ul style="list-style-type: none"> - let you know what is going on in your account or network; - map your network to set visibility and recommendations; - contact you about troubleshooting. 	<p>Our Service needs this personal data.</p> <p>We have a legitimate interest in informing you about membership status, account activity and other service updates.</p> <p>You can unsubscribe from our emails through the app, the settings, and the bottom of the emails' unsubscribe link.</p>
Your geolocation and location	
<ul style="list-style-type: none"> - improve User recommendations; - display on your User Profile. 	<p>We process this personal data because it is part of the Service you expect from us.</p> <p>Your geolocation is not expressively shared through the app to other Users but used in our algorithm.</p> <p>You can stop sharing your geolocation in your cookie settings.</p>
User messages	
<ul style="list-style-type: none"> - When a User raises a non-compliant or misconduct report, we may require information; - respond to law enforcement requests. 	<p>The processing is necessary for us to comply with the law.</p>
Our communications	
<ul style="list-style-type: none"> - tailor our messages to you; 	

- Using anonymised information, We train, and improve our services.	We have a legitimate interest in training our staff optimally.
Device and browser language and IP address	
- tailor our messages to you in the most frictionless possible way.	We have a legitimate interest in offering an optimised Service.
E-mail delivery, open, rate and clicks	
- improve the relevance of our messages.	We have a legitimate interest in offering an optimised Service.

F. Do you share my information with third parties?

Please note that we do not sell your information and we will never sell your information to any third parties.

We comply with all data privacy regulatory requirements and information security standards.

To provide you with our Services, we may share your information with

- i. [Wix](#);
- ii. [Google Analytics](#)
- iii. [Circle.so](#)
- iv. [Stripe](#)

You can find links to each privacy policy under names mentioned above.

G. How long will we hold your information?

We have a record retention process in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet our legal commitments. When and where our Service no longer requires your information, we will dispose of it securely.

II. Your rights as a Data Subject

A. How can you access and update your information?

We want to ensure that your personal information is accurate and up to date. You can access most of your information and update it from the Platform's settings. You have the right to request a copy of the information we retain and process about you. You may also ask us to correct or remove information you think is inaccurate.

According to the European General Data Protection Regulation (GDPR) of 2018, visitors and users of websites and web platforms have extended rights to how their personally identifiable information (PII) is used, including capturing, processing and retaining. Those rights include

- i. **The right to be informed:** Our online users have the right to be informed of what data we obtain and process about them. You can request this information by contacting anna@amradvisory.com
- ii. **The right to rectification:** A user has the right to request updates and changes to their data if they cannot do so themselves. You may request support from anna@amradvisory.com
- iii. **The right to be forgotten (data deletion):** users may close or remove their active account from our platform. In this instance, we will remove all personal information from our Platform, except data required for regulatory or audit purposes. This generally does not include Personally Identifiable Information or Personal Sensitive Information.
- iv. **The right to data portability:** Users may request an extract of their data in a machine-readable format. You can request this at anna@amradvisory.com
- v. **The right to withdraw consent to specific data use:** Users can update their cookie settings.
- vi. **The right to raise a complaint to the Data Privacy Authorities:** If you have not received a satisfactory response from our Data Management Teams, you may raise a complaint with the respective data privacy authority in your territory. You can find more information on this [here](#)

B. When can we contact you in the future?

We would like to send you information about our Services and those of selected third parties. We may do this by email or social networks unless you have told us not to contact you this way. We will always ask you to confirm in advance that you are happy for us to allow third parties to contact you by email.

III. Cookies

C. What are Cookies?

Cookies are small data files placed on your computer or mobile device when you visit a website. Website owners widely use cookies to make their websites work more efficiently and provide reporting information.

AMRA Advisory cookies are “first party cookies”.

Other parties' cookies are “third-party cookies”. Third-party cookies enable our website to offer third-party features or functionalities (e.g., app advertising, interactive content, and analytics). The parties that set these third-party cookies can recognize your computer on their website and other websites.

D. What Cookies does AMRA Advisory use?

Our website does not directly use cookies to distinguish you from other users.

IV. Does the policy apply to linked websites?

Our website contains links to other websites. This privacy policy only applies to this website, so you should read other websites' privacy policies that you visit.

V. Who can you contact if you have queries about this privacy policy?

Please contact us if you have any questions about our privacy policy or information, we hold about you.

Email: anna@amradvisory.com