

PRIVACY POLICY

~ Effective Date: February 25, 2025 ~

Table of Content

1. Introduction	2
2. Data We Collect.....	2
3. How We Use Your Data.....	3
4. Legal Basis for Processing	3
5. Data Retention.....	4
6. Disclosing Your Personal Data.....	5
7. Data Protection and Third-Party Obligations.....	6
8. Security Measures	6
9. Your Rights.....	7
10. Third-Party Links	8
11. International Data Transfers	8
12. Cookies & Tracking Technologies	9
13. Changes to This Privacy Policy.....	10
14. Contact Us.....	10

1. Introduction

Corcoran Holding Limited registered at Chrysanthemum Mylonas, 10, MAGNUM HOUSE, 3030, Limassol, Cyprus, with registration number HE 210756 ("Company," "we," "us," or "our"), is committed to protecting the privacy and personal data of users who visit our website www.2smalls.com ("Website"). This Privacy Policy explains how we collect, use, disclose, and protect your personal data in compliance with the applicable laws of Cyprus.

2. Data We Collect

2.1. When you use our Website, we may collect the following personal data:

Category	Data Collected	Legal Basis for Processing	Purpose of Collection	Retention Period
Identification Data	Full Name	Legitimate interest (Art. 6(1)(f) GDPR) or Consent (Art. 6(1)(a) GDPR)	To identify users for communication or service inquiries	Retained as long as necessary for business purposes, unless deletion is requested
Contact Information	Email Address, Phone Number	Legitimate interest (Art. 6(1)(f) GDPR) or Consent (Art. 6(1)(a) GDPR)	To respond to inquiries, provide support, or send relevant updates	Retained as long as necessary for business purposes, unless deletion is requested
Commercial Information	Products browsed, services used, subscriptions	Legitimate interest (Art. 6(1)(f) GDPR) or Consent (Art. 6(1)(a) GDPR)	To improve service offerings, personalize user experience, and analyze trends	Retained for up to 12 months
Email Interaction Data	Email address, IP address, time of interaction	Consent (Art. 6(1)(a) GDPR)	To track engagement with our communications and optimize content	Retained for up to 24 months
Other Information	Feedback, questions, suggestions	Legitimate interest (Art. 6(1)(f) GDPR)	To enhance user experience, respond to queries, and improve services	Retained for up to 24 months
Sensitive Data	Not collected	Not applicable	Not applicable	Not applicable

2.2. We collect personal data through the following means:

2.2.1. **Direct Collection.** When users voluntarily submit their data via contact forms, email communications, inquiries, or feedback submissions.

- 2.2.2. **Automated Collection.** We may collect technical data such as IP addresses, browser types, and access logs through website analytics tools, which help us optimize the user experience.
- 2.2.3. **Third-Party Sources.** If applicable, we may receive data from third-party services, such as customer relationship management (CRM) tools, email analytics providers, or business partners.
- 2.3. We process personal data only **for legitimate purposes**, including:
 - 2.3.1. Responding to inquiries and providing customer support.
 - 2.3.2. Managing business communications and administrative purposes.
 - 2.3.3. Improving our website's performance, security, and user experience.
 - 2.3.4. Tracking user engagement with emails and optimizing communication strategies.
 - 2.3.5. Enhancing service offerings and analyzing trends.
 - 2.3.6. Complying with legal obligations.
- 2.4. We do not collect sensitive personal data unless required by law or with your explicit consent.

3. How We Use Your Data

- 3.1. We use the collected personal data for the following purposes, in accordance with applicable laws:
 - 3.1.1. **To respond to inquiries and provide customer support** – We use your contact details to communicate with you regarding any questions, requests, or issues related to our Website and services.
 - 3.1.2. **To communicate with you regarding our services, offers, and updates** – If you provide your consent, we may send you promotional emails, newsletters, or notifications about our services, special offers, and company updates. You may opt out of such communications at any time.
 - 3.1.3. **To improve and optimize our Website** – We analyze user behavior, feedback, and website interactions to enhance functionality, performance, and user experience. This may include the use of analytics tools to assess trends and improve navigation.
 - 3.1.4. **To comply with legal obligations and regulatory requirements** – We may process and store your personal data to meet our legal obligations, including record-keeping, tax, anti-fraud, and other compliance requirements under Cyprus law and applicable EU regulations.
 - 3.1.5. **To ensure security and prevent fraud** – We monitor website activity to detect, investigate, and prevent fraudulent transactions, unauthorized access, or other security threats.
 - 3.1.6. **To enforce our terms and protect our rights** – If necessary, we may process your data to enforce our legal agreements, protect our rights, or respond to claims.

4. Legal Basis for Processing

- 4.1. We process personal data in accordance with the General Data Protection Regulation and the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of Such Data Law 125(I)/2018 of Cyprus. The legal bases for processing your personal data include the following:

- 4.1.1. Performance of a Contract (Article 6(1)(b) GDPR; Section 6(1)(b) Law 125(I)/2018) – Processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract. This includes responding to inquiries, providing our services, and managing our business relationship with you.
- 4.1.2. Legitimate Interests (Article 6(1)(f) GDPR; Section 6(1)(f) Law 125(I)/2018) – Processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your fundamental rights and freedoms. Our legitimate interests include: (i.) enhancing and optimizing our Website's functionality and user experience; (ii.) ensuring the security of our systems and preventing fraud; (iii.) communicating with you about our services, offers, and updates.
- 4.1.3. Consent (Article 6(1)(a) GDPR; Section 6(1)(a) Law 125(I)/2018) – Processing is based on your explicit consent for specific purposes. This applies when you have voluntarily provided your personal data and agreed to its processing, such as subscribing to newsletters or participating in surveys. You have the right to withdraw your consent at any time.
- 4.1.4. Compliance with Legal Obligations (Article 6(1)(c) GDPR; Section 6(1)(c) Law 125(I)/2018) – Processing is necessary for compliance with our legal obligations under the laws of Cyprus and the European Union. This includes obligations related to accounting, taxation, anti-money laundering, and responding to lawful requests from public authorities.
- 4.1.5. Protection of Vital Interests (Article 6(1)(d) GDPR; Section 6(1)(d) Law 125(I)/2018) – Processing is necessary to protect your vital interests or those of another natural person. This applies in emergency situations where processing your personal data is essential to safeguard life or health.
- 4.1.6. Performance of a Task Carried Out in the Public Interest or in the Exercise of Official Authority (Article 6(1)(e) GDPR; Section 6(1)(e) Law 125(I)/2018) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us, as may be prescribed by law.

5. Data Retention

- 5.1. We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by applicable EU and Cyprus data protection laws, including GDPR and Law 125(I)/2018.
- 5.2. The specific retention periods depend on the type of personal data and the purpose for which it is processed. We apply the following retention periods unless a longer retention period is required by law:
 - 5.2.1. General Inquiries and Customer Support Data – Retained for 12 months after the last interaction unless a longer period is necessary for legal or contractual reasons.
 - 5.2.2. Business Communication Data – Retained for the duration of the business relationship and up to 5 years after termination for record-keeping and legal compliance.
 - 5.2.3. Marketing and Promotional Data – Retained until consent is withdrawn or for a maximum of 24 months from the last engagement with our communications.
 - 5.2.4. Website Analytics Data – Retained for 6 to 24 months, depending on technical necessity and business needs.
 - 5.2.5. Legal and Compliance Data – Retained for as long as required by Cyprus or EU laws, including tax, anti-money laundering, and regulatory obligations.
- 5.3. After the applicable retention period expires, we will:

5.3.1. Securely delete your personal data from our systems and records.

5.3.2. Anonymize data where required for statistical, research, or business analytics purposes, ensuring it is no longer personally identifiable.

5.4. If you request the erasure of your personal data, we will comply with your request unless retention is required under applicable laws, including obligations for regulatory compliance, dispute resolution, or fraud prevention.

6. Disclosing Your Personal Data

6.1. We may share your personal data with authorized third parties when necessary to deliver our services, comply with legal obligations, or meet our legitimate interests. The categories of recipients and the reasons for sharing your data are as follows:

6.2. **Service Providers and Partners.** We disclose your personal data to trusted service providers and partners who assist us in delivering our services, including hosting providers, payment processors, marketing platforms, customer support tools, and analytics services. These third parties process data only under our instructions and in compliance with applicable laws.

6.3. Third-party service providers we may share your data with include:

Entity	Purpose of Sharing	Website Link
Lime Trading (CY) Ltd	Facilitates global Lime operations, user account management, analytics, and cross-platform functionality.	https://int.lime.co/
Lime Trading Corp.	Provides Lime services within the United States, including rentals, customer support, and promotional campaigns.	https://lime.co/
Lime FinTech LLC	Oversees global marketing initiatives, partner integrations, and operational scalability for Lime services.	https://limex.com/
Lime FinTech LLC	Manages operations, regional services, and compliance with local laws in the Middle East region.	https://limex.me/
Lime Prime Limited	Facilitates funding-related initiatives, financial services, and applications for cross-platform service enhancements.	https://try2bfunded.com/ https://www.lime-prime.com/
LendingRobot	AI-powered investment automation and lending analytics.	https://www.lendingrobot.com/
ziplime	Financial services and digital payment solutions.	https://www.ziplime.com/
Boosted.ai	AI-driven financial modeling and investment analytics.	https://www.boosted.ai/

6.4. **Additional third-party recipients include:**

- 6.4.1. Website analytics companies, such as Google Analytics, to analyze data and improve our services and the Website.
- 6.4.2. Advertising companies, such as Google AdWords, for marketing and promotional purposes.
- 6.4.3. Social media platforms, such as Facebook, Instagram, LinkedIn, Twitter, YouTube, Telegram, GitHub, Discord, Medium, and Reddit, to promote our presence and engage with users.

6.5. **Third Parties Required for Service Integration.** Certain features of our services rely on integrations with third-party platforms or tools. In such cases, we share relevant technical data, usage logs, and authentication details necessary to enable these integrations securely.

6.6. **Legal and Regulatory Authorities.** We may disclose your personal data when required to comply with applicable laws, regulations, legal processes, or enforceable governmental requests. This includes sharing data with regulatory authorities, courts, or law enforcement to meet compliance requirements or protect against fraudulent or illegal activities.

6.7. **Business Transfers.** In the event of a merger, acquisition, or sale of assets, your personal data may be shared with the relevant parties involved in the transaction. We ensure that these parties are obligated to protect your data in accordance with this Privacy Policy and applicable laws.

6.8. **Advertising and Marketing Partners.** With your explicit consent, we may share data with advertising partners to deliver personalized advertisements and measure the effectiveness of our marketing campaigns. This may include technical data, usage data, and preferences collected through cookies or similar technologies.

6.9. **Dispute Resolution and Legal Claims.** We may share your personal data with legal representatives, advisors, or other third parties in the context of:

- 6.9.1. Resolving disputes,
- 6.9.2. Enforcing our agreements,
- 6.9.3. Protecting our legal rights.

6.10. **Consent-Based Sharing.** If you explicitly consent, we may share your personal data with third parties for purposes not covered above. You may withdraw your consent at any time.

7. Data Protection and Third-Party Obligations

7.1. We ensure that all third parties with whom we share your personal data are bound by confidentiality and data protection obligations in accordance with GDPR, Cyprus Law 125(I)/2018, and other applicable laws.

7.2. While we take reasonable steps to verify that these third parties implement adequate safeguards, we are not responsible for breaches, misuse, or non-compliance on the part of these third parties.

7.3. Your personal data will never be sold to unauthorized third parties.

8. Security Measures

8.1. We take the security of your personal data seriously and implement appropriate technical and organizational measures to protect it against unauthorized access, loss, misuse, alteration, or destruction.

These measures are designed to ensure a level of security appropriate to the risk, in accordance with Article 32 of GDPR and Cyprus Law 125(I)/2018.

- 8.2. The security measures we implement include, but are not limited to:
- 8.2.1. **Data Encryption** – Personal data is encrypted during transmission and storage to prevent unauthorized access.
 - 8.2.2. **Access Controls** – Access to personal data is restricted to authorized personnel only, based on their role and necessity.
 - 8.2.3. **Secure Storage** – Data is stored on secure servers with protection against unauthorized access, cyber threats, and data breaches.
 - 8.2.4. **Regular Security Audits** – We conduct periodic security assessments and updates to identify vulnerabilities and strengthen our systems.
 - 8.2.5. **Anonymization and Pseudonymization** – Where possible, we minimize personal data exposure through anonymization or pseudonymization.
 - 8.2.6. **Incident Response Plan** – In case of a data breach, we follow GDPR-compliant procedures to mitigate risks, notify affected users, and report the incident to the Cyprus Data Protection Authority when required.
- 8.3. Despite our efforts to protect your personal data, no method of transmission or storage is completely secure. Therefore, we cannot guarantee absolute security, and users are encouraged to take their own precautions, such as using strong passwords and keeping login credentials confidential.
- 8.4. If you believe your personal data has been compromised or you notice any suspicious activity, please contact us immediately at privacy@2smalls.com so we can investigate and take appropriate action.

9. Your Rights

- 9.1. Under applicable data protection laws, including the GDPR and Cyprus's Law 125(I)/2018, you have the following rights regarding your personal data:
- 9.1.1. **Right of Access** – You have the right to request information about the personal data we hold about you and how it is processed. You may also request a copy of your personal data.
 - 9.1.2. **Right to Rectification** – If any of your personal data is inaccurate or incomplete, you have the right to request corrections or updates.
 - 9.1.3. **Right to Erasure (“Right to be Forgotten”)** – You may request the deletion of your personal data in certain circumstances, including when: (i.) the data is no longer necessary for the purposes for which it was collected; (ii.) You withdraw your consent (where applicable); (iii.) You object to processing, and there are no overriding legitimate grounds (iv.) the data has been unlawfully processed.
 - 9.1.4. **Right to Withdraw Consent** – Where processing is based on consent (e.g., marketing communications), you can withdraw your consent at any time without affecting the lawfulness of prior processing.
 - 9.1.5. **Right to Object to Processing** – You have the right to object to processing based on legitimate interests, direct marketing, or automated decision-making, including profiling.
 - 9.1.6. **Right to Restriction of Processing** – You can request that we temporarily limit processing of your data in certain circumstances, such as when you contest the accuracy of the data or object to processing.

9.1.7. **Right to Data Portability** – If processing is based on consent or contract and carried out by automated means, you can request your data in a structured, commonly used, and machine-readable format, and you have the right to transfer this data to another controller.

9.1.8. **Right to Lodge a Complaint** – If you believe we have violated data protection laws, you have the right to lodge a complaint with the relevant data protection authority in Cyprus:

9.2. Office of the Commissioner for Personal Data Protection

9.2.1. Address: Iasonos 1, 1082 Nicosia, Cyprus

9.2.2. Website: www.dataprotection.gov.cy

9.2.3. Email: commissioner@dataprotection.gov.cy

9.3. **How to Exercise Your Rights.** To exercise any of the rights mentioned above, you can submit a request by contacting us at:

9.3.1. Email: privacy@2smalls.com

9.3.2. Postal Address: Chrysanthemum Mylonas, 10, MAGNUM HOUSE, 3030, Limassol, Cyprus

9.4. We will respond to all legitimate requests within one month, as required by GDPR and Cyprus Law 125(I)/2018. If a request is complex or numerous, we may extend this period by an additional two months but will inform you accordingly.

10. Third-Party Links

10.1. Our Website may contain links to third-party websites, services, or applications that are not operated or controlled by us. Clicking on these links may direct you to external platforms governed by their own privacy policies and terms of service.

10.2. We do not assume responsibility for the privacy practices, data security, or content of third-party websites. If you choose to access these links, we encourage you to carefully review the respective privacy policies and data protection practices of these third-party websites before providing any personal data.

10.3. Some third-party links may include:

10.3.1. Social media platforms (e.g., Facebook, Instagram, LinkedIn, Twitter, Telegram, YouTube).

10.3.2. Advertising and analytics providers (e.g., Google Analytics, Google Ads).

10.3.3. Service providers and business partners integrated into our operations.

10.4. This Privacy Policy applies solely to our Website. We do not control, endorse, or monitor third-party privacy practices, and we disclaim any liability for data collection, use, or security measures implemented by external websites.

11. International Data Transfers

11.1. As part of our business operations, we may transfer your personal data to third parties, service providers, or business partners located outside the European Economic Area (the “EEA”). These transfers occur only when necessary for the provision of services, business operations, or compliance with legal obligations.

11.2. When transferring your personal data outside the EEA, we ensure that adequate safeguards are in place to protect your rights and freedoms under Articles 44-49 of GDPR. These safeguards may include:

- 11.2.1. **Adequacy Decisions** – We transfer personal data to countries that have been deemed to provide an adequate level of data protection by the European Commission.
- 11.2.2. **Standard Contractual Clauses (SCCs)** – If no adequacy decision exists, we implement European Commission-approved SCCs to ensure that recipients uphold GDPR-level data protection standards.
- 11.2.3. **Binding Corporate Rules (BCRs)** – For intra-group transfers, we may rely on BCRs approved by data protection authorities to enforce strong security and privacy measures.
- 11.2.4. **Derogations Under Article 49 GDPR** – In exceptional cases where no other legal mechanism applies, we may transfer data based on your explicit consent or when necessary for contractual performance, public interest, legal claims, or vital interests.
- 11.3. When engaging with **global business partners**, data may be shared under appropriate legal safeguards.
- 11.4. If your personal data is transferred outside the EEA, you have the right to:
 - 11.4.1. **Request a copy** of the safeguards used for the transfer.
 - 11.4.2. **Object to the transfer** under certain conditions.
 - 11.4.3. **Be informed** of any significant changes affecting your data's security.

12. Cookies & Tracking Technologies

- 12.1. What Are Cookies? Cookies are small text files stored on your device when you visit our Website. They help us improve functionality, analyze usage, and personalize content. Cookies may be set by us (first-party cookies) or by third parties (third-party cookies) that provide services on our Website.
- 12.2. We may use the following types of cookies:
 - 12.2.1. **Essential Cookies** – Necessary for the Website to function properly (e.g., security, authentication). These **cannot be disabled**.
 - 12.2.2. **Analytics Cookies** – Help us analyze how users interact with the Website (e.g., Google Analytics).
 - 12.2.3. **Functionality Cookies** – Enable enhanced features like remembering preferences.
 - 12.2.4. **Marketing Cookies** – Used for personalized ads and tracking across websites (e.g., Google Ads, Facebook Pixel).
- 12.3. Under Article 6(1)(a) GDPR, we require your consent before setting non-essential cookies. Essential cookies are processed based on legitimate interest (Article 6(1)(f) GDPR).
- 12.4. You can control cookies by:
 - 12.4.1. Adjusting browser settings to block or delete cookies.
 - 12.4.2. Using our Cookie Consent Tool to accept/reject non-essential cookies.
 - 12.4.3. Opting out of third-party tracking via their privacy settings.
- 12.5. Our Website may use third-party tools, such as:
 - 12.5.1. Google Analytics – Tracks user behavior (Privacy Policy).
 - 12.5.2. Facebook Pixel – Tracks ad conversions (Privacy Policy).
 - 12.5.3. Other tracking technologies used for advertising and analytics.

12.6. We may update this section based on changes in regulations or how we use cookies. Any changes will be posted on this page.

13. Changes to This Privacy Policy

13.1. We may update this Privacy Policy from time to time to reflect changes in legal requirements, business practices, or the way we process personal data.

13.2. Any modifications to this Privacy Policy will be published on our Website, and the “Last Updated” date at the top of the policy will be adjusted accordingly.

13.3. If we make material changes that significantly affect your rights or the way we process your personal data, we will provide additional notice via:

13.3.1. A prominent notice on our Website,

13.3.2. An email notification (if applicable and required by law), or

13.3.3. Other appropriate communication channels.

13.4. Your continued use of our Website after any updates to this Privacy Policy will constitute acceptance of the revised terms. If you do not agree with any changes, you should stop using our Website and may exercise your rights as described in **Clause “Your Rights”**.

13.5. We encourage you to periodically review this Privacy Policy to stay informed about how we process and protect your personal data.

14. Contact Us

14.1. If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, you may contact us using the details below:

14.1.1. Company Name: Corcoran Holding Limited

14.1.2. Company Address: Chrysanthemum Mylonas, 10, MAGNUM HOUSE, 3030, Limassol, Cyprus

14.1.3. Email: privacy@2smalls.com

14.1.4. Website: <https://2smalls.com/>

14.2. If you wish to exercise your data protection rights, as outlined in Section 8 (Your Rights), please include sufficient details in your request to allow us to verify your identity and process your inquiry in accordance with GDPR and Cyprus Law 125(I)/2018.
