

# LYRA QUANTUM

## PRIVACY POLICY

GDPR Compliant — Global Coverage

Effective: April 2026

Larenova s.p., Tim Lukežič | VAT: 63750244

support@lyra-quantum.com

### 1. Introduction

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Larenova s.p., Tim Lukežič (VAT ID: 63750244), Jemčeva C. 23, 1236 Trzin, Slovenia ("we", "us", "our") operates Lyra Quantum (lyra-quantum.com). This Privacy Policy explains how we collect, use, store, and protect your personal data when you use our Service, in compliance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and applicable international data protection laws.

Data Controller: Larenova s.p., Tim Lukežič, Jemčeva C. 23, 1236 Trzin, Slovenia. Contact: support@lyra-quantum.com

### 2. Data We Collect

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#### 2.1 Data You Provide Directly

- Full name and email address (provided at registration)
- Broker API key and API secret (encrypted and stored securely)
- Discord username (optional)
- Payment information (processed by Stripe — we do not store card details)
- Support communications and correspondence

#### 2.2 Data Collected Automatically

- IP address and approximate geographic location
- Browser type, operating system, and device information
- Login timestamps and session duration
- Dashboard usage patterns and feature interactions

#### 2.3 Trading Data

- Your Bybit account balance (read via API, not stored permanently)
- Trade history generated through our Service
- Position sizes, P&L data, and performance metrics
- Signal delivery and execution logs

### 3. How We Use Your Data

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We use your personal data for the following purposes and legal bases:

- Contract performance: To provide the Service, execute trades, deliver signals, and manage your subscription
- Contract performance: To process payments, manage billing, and communicate subscription changes
- Legitimate interest: To monitor and improve Service performance, security, and reliability
- Legitimate interest: To detect and prevent fraud, abuse, and unauthorized access
- Legal obligation: To comply with applicable laws, regulations, and lawful requests
- Consent (where applicable): To send marketing communications — you may opt out at any time

### 4. API Keys

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4.1. Your broker API keys are encrypted using AES-256 symmetric encryption (Fernet) before storage. The encryption key is stored separately from the encrypted data.

4.2. API keys are used solely to execute trading operations on your behalf as part of the Service. They are never shared with third parties.

4.3. We strongly recommend using API keys with Order and Position permissions only — never Withdrawal permissions. This ensures that even in the unlikely event of a security breach, your funds cannot be withdrawn.

4.4. You may revoke and replace your API keys at any time through your dashboard Settings.

### 5. Data Sharing

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We do not sell, rent, or trade your personal data. We share data only with:

- Stripe Inc. — payment processing (governed by Stripe's Privacy Policy)
- Bybit / connected brokers — trade execution via your API keys
- Hetzner Online GmbH — VPS infrastructure hosting (EU-based, GDPR compliant)
- Discord Inc. — optional signal delivery (only if you connect Discord)

All third-party processors are bound by data processing agreements and required to maintain appropriate security standards.

We may disclose your data if required by applicable law, court order, or government authority, or to protect the rights, property, or safety of the Company or others.

### 6. Data Retention

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6.1. Account data (name, email) — retained for the duration of your subscription plus 3 years for legal compliance.

6.2. API keys — deleted within 30 days of account cancellation.

6.3. Trading logs and performance data — retained for 5 years for audit and legal purposes.

6.4. Payment records — retained for 10 years as required by EU accounting law.

6.5. Support communications — retained for 3 years.

## 7. Your Rights Under GDPR

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If you are located in the European Economic Area (EEA), you have the following rights:

- Right of access — request a copy of the personal data we hold about you
- Right to rectification — request correction of inaccurate or incomplete data
- Right to erasure — request deletion of your personal data (subject to legal retention obligations)
- Right to restriction — request that we limit processing of your data
- Right to data portability — receive your data in a structured, machine-readable format
- Right to object — object to processing based on legitimate interests
- Right to withdraw consent — where processing is based on consent, withdraw it at any time

To exercise any of these rights, contact us at [support@lyra-quantum.com](mailto:support@lyra-quantum.com). We will respond within 30 days. You also have the right to lodge a complaint with your national data protection authority.

## 8. Cookies

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8.1. Our website uses essential cookies required for authentication and session management. These cannot be disabled without impairing Service functionality.

8.2. We may use analytics cookies to understand how users interact with the Service. These are only placed with your consent.

8.3. We do not use advertising or tracking cookies.

8.4. You can manage cookie preferences through your browser settings at any time.

## 9. Data Security

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9.1. We implement industry-standard security measures including AES-256 encryption for sensitive data, TLS 1.3 for data in transit, access controls, and regular security reviews.

9.2. Despite our best efforts, no system is completely secure. In the event of a data breach affecting your rights and freedoms, we will notify you and applicable authorities within 72 hours as required by GDPR.

## 10. International Data Transfers

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Your data is primarily processed within the European Union (Hetzner servers, Finland). Where data is transferred outside the EEA (e.g., to Stripe in the US), such transfers are governed by Standard Contractual Clauses or other lawful mechanisms approved by the European Commission.

## 11. Children's Privacy

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The Service is not directed to individuals under 18 years of age. We do not knowingly collect personal data from minors. If you believe we have inadvertently collected data from a minor, contact us immediately.

## **12. Changes to This Policy**

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We may update this Privacy Policy from time to time. Material changes will be communicated via email at least 14 days before taking effect. Continued use of the Service after the effective date constitutes acceptance of the updated policy.

## **13. Contact**

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For privacy-related inquiries, data subject requests, or complaints:

Larenova s.p., Tim Lukežič

Jemčeva C. 23, 1236 Trzin, Slovenia

VAT ID: 63750244

Email: [support@lyra-quantum.com](mailto:support@lyra-quantum.com)

Website: <https://lyra-quantum.com>

Response time: within 30 days for formal data subject requests, within 2 business days for general inquiries.