

Privacy Policy



Last Updated: November 10, 2025

1. Introduction

Investline ("Investline", "Company", "we", "us", or "our") is committed to protecting the privacy, confidentiality, and security of your personal data.

This Privacy Policy is a legally binding document that forms an integral part of our Terms and Conditions. It describes in detail how we collect, use, disclose, process, transfer, retain, and safeguard your personal information when you access or use our website (investline.io), our mobile application, or any of our related services (collectively, the "Services").

Investline is a private real estate investment platform operating in accordance with:

- Applicable laws of the Republic of Iraq
- Applicable laws of the Kurdistan Region of Iraq
- International privacy standards, incorporating principles from regulations such as the GDPR, including lawfulness, fairness, transparency, data minimization, accuracy, storage limitation, integrity, and accountability.

By using our Services, you acknowledge that you have read and understood this policy and agree to the collection and processing of your personal data as described herein. If you do not agree with this policy, you must not access or use our Services.

2. Data Controller Information

The data controller responsible for the processing of your personal information is:

Investline Company

Registered in: Duhok, Kurdistan Region, Republic of Iraq

Business Activity: Real Estate Investment Platform

Email: support@investline.io | Website: investline.io

3. Data Protection Officer / Privacy Contact

For all questions and requests specifically related to this Privacy Policy or the exercise of your data protection rights, you may contact our dedicated privacy team at:

Email: privacy@investline.io

You can also use our general support channel at support@investline.io.

4. Scope and Application

This Privacy Policy applies to:

- All visitors of our website and users of our mobile application.
- Registered users, verified investors, and individuals participating in KYC/AML checks.
- Any individual who interacts with our platform, services, or customer support.

This policy does not apply to:

- Third-party websites, platforms, or services linked through our platform.
- The independent privacy practices of external service providers.
- Any platform or service not under the direct control of Investline.

5. Definitions

For the purposes of this Privacy Policy:

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Sensitive Personal Data:** A special category of data including government-issued identity documents, biometric data, financial records, and data collected for KYC/AML purposes.
- **Processing:** Any operation or set of operations performed on Personal Data, such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.
- **KYC/AML:** Know Your Customer and Anti-Money Laundering procedures legally required to prevent money laundering, terrorist financing, fraud, and other financial crimes.
- **SPV:** A Special Purpose Vehicle, which is a legal entity created to facilitate a specific investment project.

6. Categories of Personal Data We Collect

We may collect the following categories of data:

6.1. Identification Data: Full name, National ID card, Passport, Civil/Unified number, Date and place of birth, Signature, Nationality.

6.2. Contact Information: Phone number, email address, physical address, emergency contact details (if legally required).

6.3. Financial Information: Bank account details, payment transaction records, investment amounts, withdrawal details, SPV-related ownership allocations.

6.4. KYC/AML Information: Collected in accordance with Iraqi and Kurdistan AML laws, including identity documents, source of funds and wealth, proof of address, profession, employer, sanctions/PEP screening results, and risk scoring.

6.5. Technical & Device Information: IP address, browser type, device type, operating system, approximate location, login timestamps, usage logs, and session data collected automatically via cookies and logs.

6.6. Biometric Data (if used): Only if you voluntarily enable device-based security features (e.g., facial recognition or fingerprint ID). Investline does not store raw biometric data on its servers; processing occurs locally on your device.

6.7. Behavioral & Investment Data: Assets you view, investment amounts, return on investment history, preferences, and records of your communications with our support team.

7. How We Collect Your Personal Data

We collect data through the following methods:

- **Directly from you** during registration, verification processes, investment activities, or when you communicate with our support team.
- **Automatically** when you use our website or mobile application via cookies and similar tracking technologies.
- **From third-party service providers**, such as payment processors, identity verification services, and analytics providers.
- **From publicly available sources**, such as sanctions lists and Politically Exposed Persons (PEP) databases, as part of our KYC/AML obligations.

8. Legal Bases for Processing

We process your Personal Data based on one or more of the following legal grounds:

- **Contractual Necessity:** To perform our contract with you, including providing the Services, managing your account, processing investments, and distributing returns.

- **Legal Obligation:** To comply with our legal and regulatory duties, including but not limited to Iraq & Kurdistan AML Law, anti-terrorism financing laws, record-keeping requirements, and responses to court or regulatory orders.
- **Legitimate Interests:** To secure our platform, prevent fraud, ensure network and information security, and improve our Services, provided such interests are not overridden by your data protection rights.
- **Consent:** For specific purposes where we have obtained your clear and explicit consent, such as for certain marketing communications or non-essential cookies. You may withdraw your consent at any time.
- **Vital or Public Interest:** When necessary to comply with requests from law enforcement or regulatory bodies in the public interest.

9. How We Use Your Personal Data

We use your data for the following purposes:

- **Service Provision & Improvement:** To create and manage your account, verify your identity, process investments, manage SPV allocations, update your dashboard, and execute transactions.
- **KYC/AML Compliance:** To fulfill our legal obligation to verify your identity, assess risk, comply with regulatory audits, and prevent money laundering, terrorist financing, and other illegal activities.
- **Legal & Regulatory Obligations:** For reporting to authorities, responding to lawful requests, and maintaining compliance logs as required by law.
- **Security & Fraud Prevention:** To monitor login patterns, prevent unauthorized access, and investigate suspicious or fraudulent behavior.
- **Customer Support:** To resolve issues, communicate service updates, and provide notifications related to your account and investments.
- **Marketing:** To send you updates, news, and information about new investment opportunities, but only where we have your explicit consent. You may opt-out of marketing communications at any time.

10. Sharing and Disclosure of Personal Data

We may share your data only in the following circumstances and with appropriate safeguards:

- **Within Investline:** With authorized employees and personnel on a strict need-to-know basis, all of whom are bound by confidentiality obligations.
- **With Third-Party Service Providers:** All our service providers (including cloud hosting, payment processors, KYC/AML verification providers, legal consultants, auditors, and IT/cybersecurity firms) are bound by strict contractual agreements that mandate confidentiality and data protection.
- **With Legal or Regulatory Authorities:** When required to do so by Iraqi/Kurdistan AML laws, court orders, governmental authorities, or security agencies.
- **For SPV-Related Transfers:** When necessary to link you to investment ownership records within the legal structure of a project.
- **For Business Transfers:** In connection with a merger, acquisition, sale of company assets, or other business transition, subject to the recipient adhering to the terms of this Privacy Policy.

We never sell your Personal Data to third parties.

11. International Data Transfers

Your Personal Data may be transferred to and processed in countries outside of Iraq, including the United Arab Emirates (for cloud hosting) and the United States (for analytics providers). Where we transfer your data to a country not deemed to provide an adequate level of data protection, we rely on legally approved mechanisms, such as **standard contractual clauses**, to ensure your data is protected. You may obtain a copy of these safeguards by contacting us.

12. Data Security

We implement robust technical and organizational measures to protect your Personal Data, including:

- SSL/TLS encryption for data in transit.
- Multi-factor authentication and strict access controls.
- Internal data minimization principles.
- Encrypted backups and secure payment gateways.
- Firewall and intrusion detection systems.
- Binding confidentiality agreements for all employees.

However, no method of transmission over the Internet or electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your data, we cannot guarantee its absolute security.

13. Data Retention

We will retain your Personal Data only for as long as necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law.

- **KYC/AML Records:** Retained for a minimum of 7 years as required by Iraqi and Kurdistan law.
- **Account Information:** Retained for as long as your account is active or as needed to provide you services.
- **Transaction Records:** Retained for a minimum of 7 years for financial auditing and compliance purposes.

When data is no longer required, it is securely deleted, anonymized, or archived under strict controls if continued retention is legally mandated.

14. Your Rights

Where provided by applicable law, you have the following rights regarding your Personal Data:

- The right to access and receive a copy of your Personal Data.
- The right to rectification of inaccurate or incomplete data.
- The right to erasure ('the right to be forgotten'), subject to our legal obligations.
- The right to restrict the processing of your data under certain circumstances.
- The right to object to processing based on our legitimate interests.
- The right to data portability, to receive your data in a structured, machine-readable format.
- The right to withdraw your consent at any time, where processing was based on consent.
- The right not to be subject to a decision based solely on automated processing.

To exercise any of these rights, please contact us at [support@investline.io]. We may require you to verify your identity before processing your request. We will respond to your request within a reasonable timeframe, and in any event, within one (1) month as required by applicable law. Please note that certain

rights are not absolute and may be limited, particularly where processing is required for us to comply with a legal obligation (such as KYC/AML record-keeping).

15. Lodging a Complaint

If you have a concern about our use of your Personal Data, please contact us first so we can try to resolve it. You also have the right to lodge a complaint with the relevant data protection authority in the Kurdistan Region of Iraq / Republic of Iraq, or with the supervisory authority in your country of residence or place of work.

16. Cookies and Similar Technologies

We use cookies and similar tracking technologies to operate our platform, improve performance, measure traffic, and enhance security.

- **Strictly Necessary Cookies:** These are essential for the platform to function and cannot be switched off.
- **Analytics and Performance Cookies:** These help us understand how you use the platform. You may control your consent for non-essential cookies via our cookie banner and your browser settings. For a detailed list of the cookies we use and their purposes, please see our [\[Link to Full Cookie Policy\]](#).

17. Social Media and External Platforms

Our official pages on social media platforms (e.g., Instagram, Facebook, LinkedIn) are governed by the respective privacy policies of those third-party companies. We use these platforms strictly for communication and marketing and are not responsible for their content or data practices.

18. Protection of Minors

Our Services are strictly limited to users aged 18 and older. We do not knowingly collect Personal Data from minors. If we become aware that we have inadvertently collected such data, we will take prompt steps to delete it.

19. Automated Decision-Making and Profiling

We do not use solely automated decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you. Our KYC/AML and investment approval processes always involve human review. We use analytical tools to improve our services, but this does not constitute automated decision-making in the legal sense.

20. Monitoring and Recording

We may monitor and record communications (e.g., emails, chat logs) for quality assurance, training, legal compliance, and security verification purposes.

21. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. If we make material changes, we will notify you through our Platform and/or by email. The "Last Updated" date at the top of this policy will indicate the effective date of the most recent version.

22. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

Email: [privacy@investline.io]

Website: [investline.io]

Address: Duhok, Kurdistan Region, Iraq