

eurotrader

Privacy Policy

November 2023

Privacy Policy

Eurotrade Investments RGB Ltd

1. Introduction

This Privacy Policy ('the Policy') is applicable to Eurotrade Investments RGB Limited ('Eurotrader'), a company registered in Cyprus under registration number HE317893. Eurotrader is licensed by the Cyprus Securities and Exchange Commission (CySEC) under license 279/1 and regulated by the Cyprus Data Protection Commissioner. Eurotrader will process personal data in compliance with the provisions outlined in this Policy.

This Privacy Policy delineates Eurotrader's procedures for collecting, managing, and safeguarding your confidential user information. We are unwavering in our commitment to protect and uphold the privacy of your personal data.

We kindly request that you thoroughly read and comprehend this policy to gain insight into the types of information we collect, how it is utilized, to whom it may be disclosed, and the measures we undertake to ensure its security. Please be aware that we may periodically update this Privacy Policy, and we encourage you to stay informed about any modifications. All personal information held by us will be governed by the Privacy Policy in force at that time.

2. Understanding the Data, We Collect and Store

We collect personal data from customers and potential customers, including but not limited to:

Name, Surname, and contact details.

Date of birth and gender.

Information about income, wealth, assets, liabilities, account balances, trading statements, tax and financial statements.

Location information.

IP address, device specifications, and other information related to your trading experience.

Profession and employment details.

Knowledge and experience in trading, risk tolerance, and risk profile.

Bank account, e-wallets, and credit card details.

Details of your visits to our website or apps, including traffic data, location data, weblogs, and other communication data.

We employ cookies for storing and gathering data regarding your interactions with our Website. Cookies are petite text files that are stashed away by your web browser on the hard drive of your device. When you visit our Website, these cookies transmit the stored information back to our web server. These cookies serve the purpose of configuring personal settings and loading your specific preferences to enhance your browsing experience. For additional information about our use of cookies, please refer to our "Cookies Page," which is accessible on our Website.

Additionally, we maintain records of your trading activities, including details such as:

- The products in which you engage in trading with us.
- Your specific preferences concerning particular product types and services.
- Historical data related to your past trades and investments, including the invested amounts.

We are mandated by law to verify your identity when you open a new account or introduce a new signatory to an existing account. In compliance with anti-money laundering regulations, we must inspect and record specific documents, both photographic and non-photographic, to adhere to the standards set forth in these laws. The required identification documentation, as dictated by anti-money laundering legislation and other regulations relevant to the services we provide, comprises:

- Passport
- Driver's license
- National identity card (if applicable)
- Proof of address (e.g., utility bills)
- Trust deed (if applicable)
- Personal credit check
- Any other information we find essential for our operations and activities.

For corporate clients, we are obligated to gather additional information, including corporate documents, addresses, details about shareholders, directors, and officers, which may include further personal information about them. We reserve the right to request any additional information we consider necessary to comply with our legal and regulatory requirements.

We acquire this information through various means, including your use of our services and websites, account opening applications, demo sign-up forms, webinar registrations, website cookies, and similar tracking technologies integrated into our Websites and Apps. We may also receive this information from third parties, such as third-party marketing lists, publicly available sources, social media platforms, introducing brokers, affiliates, banks, credit card processors, subscription-based intelligence databases, and other third-party associates.

Additionally, we may occasionally request additional personal information voluntarily, for instance, through market research, surveys, or special offers. If you choose not to provide the necessary information for a specific product or service, we may be unable to fulfil your request.

Our interactions with you in relation to the services we provide, and our ongoing relationship may be recorded, including electronic, telephone, in-person, or other forms of communication. These recordings are our sole property and serve as evidence of our communications. Telephone conversations may be recorded without the use of a warning tone or any other prior notice.

Moreover, if you visit any of our offices or premises, please be aware that we may have CCTV surveillance, which records images for security and regulatory purposes.

3. Clients' Personal Information Disclosure: Who Has Access?

To achieve the objectives outlined above, we may share your information with the following parties:

- Other companies within the group, which offer financial and related services.
- Third-party application providers when you use our apps, communication systems, and trading platforms, which may be supplied by third-party entities.
- Service providers and specialized advisors who have been engaged to deliver services such as administrative, IT, analytics, online marketing optimization, financial, regulatory, compliance, insurance, research, or other related services.
- Introducing brokers and affiliates with whom we maintain mutual relationships.
- Payment service providers and banks responsible for processing your transactions.
- Auditors, contractors, or other professionals assisting, auditing, or advising on our business operations.
- Courts, tribunals, and relevant regulatory authorities as required by law or our agreements with you.
- Government entities and law enforcement agencies as mandated by legal or regulatory obligations.
- Any third party as necessary to enforce or uphold our Terms and Conditions of Service or other pertinent agreements.
- Individuals or entities authorized by you for such disclosure.

We take measures to ensure that these third parties only receive the minimum personal data necessary to fulfil their contractual obligations to us. Our third-party service providers are prohibited from using or sharing the personal data we provide to them for any purposes other than serving our needs.

Please note that our websites or apps may contain links to external third-party websites. It's important to be aware that these third-party websites are not governed by this privacy notice and do not adhere to our privacy standards and procedures. We recommend checking the privacy practices and policies of each third party separately.

4. Obtaining Your Consent: When and How

At Eurotrader, we process your personal data based on one or more lawful bases of processing, depending on the specific purpose for which we use your data. These lawful bases include:

- To Perform Our Contractual Obligations: We process your data to fulfil our contractual commitments to you.
- To Comply with Legal and Regulatory Requirements: We may process your data to adhere to legal and regulatory obligations.
- To Pursue Our Legitimate Interests: Data processing may occur to serve our legitimate business interests.

However, in cases where the use of your personal information does not fall under one of these lawful bases, we will seek your consent. This consent should be freely given by you, and you have the right

to withdraw it at any time. You can withdraw your consent by contacting us through the contact details provided in this privacy notice or by unsubscribing from our email lists.

We may use the personal data you provide through our website or other means, as well as data collected during our business relationship, to communicate with you for marketing and promotional purposes. We also use this data to provide you with market news and analytical reports. The channels through which we may communicate with you include phone calls, emails, notifications within your online account portal, SMS notifications, and push notifications. You have the right to opt out of these communications. You can do so by using your online account portal or by sending an email to our Data Protection Officer (DPO) at dpo@eurotrader.eu, using the registered email address you have provided to us.

5. Managing Your Personal Information

At Eurotrader, safeguarding and protecting personal data is paramount. To ensure the highest level of security for the personal data you entrust to us, we have put in place appropriate technical and organizational measures. These measures protect personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access, whether it's being transmitted, stored, or otherwise processed.

To further enhance our data protection efforts, we've appointed a dedicated Data Protection Officer (DPO). This individual ensures that our handling of personal information aligns with this privacy notice and the relevant legislation.

Here are the key data protection measures we have implemented:

- **Employee Training:** We provide comprehensive training to employees who handle personal information, emphasizing the importance of customer data confidentiality and individual privacy.
- **Access Control:** Our employees are required to use secure passwords and two-factor authentication when accessing our systems. Access is limited to only the personal data necessary for their specific tasks.
- **Data Encryption:** We employ data encryption technologies during internet transactions and the transmission of client access codes across networks.
- **Security Systems:** Our systems are fortified with firewalls, intrusion detection systems, and virus scanning tools to guard against unauthorized access and protect against potential threats like viruses.
- **Secure Networks:** For electronic data outsourcing, we use dedicated secure networks and encryption to ensure the confidentiality and integrity of the information.
- **Clean Desk Policy:** Within all our premises, we practice a clean desk policy. This policy ensures that no sensitive information is left unattended and provides secure storage for physical records.
- **Physical and Electronic Security:** We employ a combination of physical and electronic security measures, including access cards, surveillance cameras, and security personnel, to protect against unauthorized access.

6. Data Storage and Retention

Storing Your Information Securely

We maintain personal information in a secure environment, utilizing a combination of safe computer storage facilities and paper-based records. We've taken rigorous measures to safeguard your personal data from any potential misuse, loss, unauthorized access, alterations, or disclosure.

Retaining Your Data

Our data retention policy ensures that we hold your information only for as long as necessary. When it's determined that personal data is no longer needed, we will either remove identifying details or securely destroy the records.

However, certain regulatory requirements necessitate the retention of records for extended periods. For example, we are subject to investment and anti-money laundering laws, which mandate us to preserve evidence related to your identity verification, financial sources, transaction monitoring, communication records (e.g., telephone, chat, and email), order and trade history, complaint handling, and evidence of compliance with regulatory codes of conduct. These records must be retained for a minimum of 5(five) years after the termination of our business relationship with you. In some cases, we may be required to maintain records for an even longer duration if instructed by regulatory authorities.

If you started an account opening registration but didn't complete it, or your account opening application was rejected, any personal data you provided will be retained for 12 months. This period may be extended if there are regulatory reasons for doing so.

If you've opted out of receiving marketing communications, your details will be added to our suppression list to ensure you do not receive further promotional messages.

Please be aware that your data may be transferred to locations outside the European Economic Area (EEA). In such cases, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy. To obtain a copy of the relevant data transfer arrangements, please contact us using the provided contact details.

7. Your Data Rights

It is essential to note that these rights may not be applicable in all situations. You have the following rights:

1. Request access to your personal data, commonly referred to as a "data subject access request."
2. Request correction of the personal data we hold about you.
3. Request erasure of your personal data. Please be aware that we may not always be able to fulfil your request for erasure due to specific legal reasons, which will be communicated to you if applicable at the time of your request.

4. Object to the processing of your personal data when we rely on legitimate interests (or those of a third party). If there is something about your particular situation that makes you want to object to processing on these grounds, as you believe it impacts your fundamental rights and freedoms, you have the right to do so. You also have the right to object when we process your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.
5. Request a restriction of the processing of your personal data. This allows you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the accuracy of the data.
 - When our use of the data is unlawful, but you do not want us to erase it.
 - When you need us to hold the data even if we no longer require it because you need it to establish, exercise, or defend legal claims.
 - If you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
6. Request the transfer of your personal data to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format to you or the third party you have chosen. Please note that this right applies to automated information (not hard copies) for which you initially provided consent for us to use or when we used the information to perform a contract with you.
7. Withdraw your consent at any time if we rely on consent to process your personal data.

Please email your personal data requests or requests for erasure to the following address: dpo@eurotrader.eu, using the registered email you provided to us.

We strive to respond to all requests within one month. In some cases, particularly if your request is complex or if you have made multiple requests, it may take longer than one month. In such cases, we will notify you within one month of receiving your request and keep you updated.

Please be aware that we may charge a reasonable fee for manifestly unfounded, excessive, or repetitive requests, or when requests are made for additional copies of the same data. If applicable, we will send you a fee request that you must accept before we process your request. In some circumstances, we may refuse to comply with your request.

8. How to Contact Us with Queries or Complaints

If you wish to exercise your rights, please contact us via email at dpo@eurotrader.eu using the email address you have provided to us. We aim to respond to all requests within one month. However, in certain cases, especially when dealing with complex requests or multiple inquiries, it may take longer. If such a delay occurs, we will inform you within one month of receiving your request and keep you updated on its status.

If you find our response to your complaint unsatisfactory, you have the option to file a complaint with the relevant supervisory authorities. You can reach out to the Cyprus Data Protection

Commissioner by visiting <http://www.dataprotection.gov.cy>. Alternatively, you may decide to file a complaint with the data protection authority in your country of residence.

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Eurotrade Investments RGB Ltd is authorised and regulated
by the Cyprus Securities and Exchange Commission

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