

PRIVACY POLICY
(hereafter “the Policy”)

UR Trade Fix Ltd

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A. INTRODUCTION

UR Trade Fix Ltd (hereafter “**the Company**”, “**the CIF**”) has established, implemented and maintains an effective Privacy Policy informing on the procedures regarding the collection, use and disclosure of personal information obtained or received when visiting the Company’s website and when using any service available through the Company’s website. Data protection law states that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have already informed you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have informed you about; and
- Kept securely / privately.

The protection of privacy and the safeguarding of your personal - financial information is highly important for us.

The Company is responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening an account or establishing a business relationship with us, you give your consent to such collection, processing, storage and use of personal information by the Company.

The Company respects the privacy of its clients, understands its importance and maintains personal data, trusted and confidential information provided by its clients as one of its highest priorities. The Company is committed to maintain the confidentiality, integrity and security of personal information in relation to current and prospective clients by respecting their right to keep their personal information confidential. In order to prevent unauthorised access and / or disclosure, the Company has in place suitable physical, electronic and / or managerial procedures and controls to ensure and / or safeguard and / or secure the security and confidentiality of the information provided by its clients and protect against unauthorised access and / or use of clients’ records and / or information.

The present Privacy Policy clearly explains how we collect, process, store and protect our Clients’ information.

References in this document to “personal data” means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Each entity which collects or receives your data under the Privacy Policy does so as a data controller. Any employee of the Company may use and share within the Company the information you provide and other information it holds about you for the purposes set out in the Privacy Policy, applying appropriate security measures to keep your information safe and secure.

As a rule, the Company refrains from any type of disclosure of personal and / or non-public information when such disclosure is not directly linked to service its clients. The Company collects the necessary information required to open a client’s account, establish a business relationship and to provide clients with the services they require.

The purpose of this Policy is to explain to you:

- what personal data of yours we collect;
- how we use your personal data;

- how, with whom, and when your personal data is shared;
- your rights; and
- other useful privacy and security related matters.

When collecting, processing and storing personal data provided by you, we are subject to the provisions of the GDPR and the relevant personal data protection Laws and Regulations of the EU and the Republic of Cyprus.

B. DEFINITIONS

“consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

“controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

“filing system” means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

“GDPR” means the European Union’s Parliament’s and Council’s General Data Protection Regulation 2016/679 that is applicable as of 25 May 2018, repealing the previous the Data Protection Directive 95/46/EC;

“Commissioner” means the Office of the Commissioner for Personal Data Protection, which is the Independent Supervisory Authority for the protection of the individual established in the Republic of Cyprus;

“personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

“recipient” means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third-party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with, the applicable data protection rules according to the purposes of the processing;

“third-party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

C. COLLECTION OF PERSONAL DATA

The Company collects personal data from you when you apply for a trading account with us and throughout the time of doing business with you, including when you visit our websites or communicate with us. When completing our live or demo account opening application form at our website <https://tradeo.com/> (“the Website”), we collect personal data that can be grouped together as following:

Type of personal data	Description and examples
Contact	<ul style="list-style-type: none"> • your name • where you live • how to contact you (including telephone number, email and home address)
Documentary Data	<ul style="list-style-type: none"> • information about you that is stored in different documents / forms / copies of them, including but not limited to the below: <ul style="list-style-type: none"> - identification documents i.e. your passport / identity card / driving license; - proof-of-residence documents i.e. bank statement / payslip / utility bill; - source-of-funds documents i.e. tax return, corporate documents of your entity, trust deeds, power of attorney, credit checks; - Appropriateness Assessment, Suitability Test, Economic Profile etc.
Personal specific-data	<ul style="list-style-type: none"> • your gender and date of birth
Financial	<ul style="list-style-type: none"> • your assets • your income, financial position / source of wealth • your employment details i.e. occupation, industry, employer name, status, history
Socio-Demographic	<ul style="list-style-type: none"> • your education • your profession • details about your nationality
Contractual	<ul style="list-style-type: none"> • details regarding the services and / or products you offered to you
Trading / Transactional information	<ul style="list-style-type: none"> • your knowledge and experience in trading, risk tolerance, risk profile • your bank account, e-wallet and credit card details
National identifier	<ul style="list-style-type: none"> • your Tax Identification Number / Code (TIN / TIC), country of tax residence
Location	<ul style="list-style-type: none"> • your IP address • your country by phone number you provided
Communication & correspondence	<ul style="list-style-type: none"> • details about you from email and / or mail correspondence and chats with us
Public Records and Open Sources	<ul style="list-style-type: none"> • details about you i.e. when you are online • other publicly available records / information
Consent / permission	<ul style="list-style-type: none"> • your consents, any permissions / preferences given to us
Behavioural	<ul style="list-style-type: none"> • historical data about the trades / investments you have traded with us • your preferences for certain types of products / services
Technical	<ul style="list-style-type: none"> • details of the device and technology you use

The Company requests certain Know-Your-Client (“KYC”) documentation in accordance with the latest Anti-Money Laundering (“AML”) Directive of the European Union, that has been adopted by the Republic of Cyprus via the AML Law No. 188(I)/2007, as in force and as this may be amended from time to time.

Furthermore, during the collection of additional client related information, including personal client information, the Company adheres to the regulations of the Office of the Commissioner of Personal Data Protection of the Republic of Cyprus and EU’s General Data Protection Regulation (“GDPR”), as in force and as this may be amended from time to time.

Such information is used for us to facilitate the evaluation of your application and complete the relevant AML, KYC, Economic Profile, Appropriateness Assessment (Product Governance Policy), Suitability Test, that we are required to, under the laws and regulations applicable to us. We also use this information for the purposes of communicating with you. We may collect details of your e-mail address at the point where you fill them in, on any landing page that may be used by the Company, so that we can later contact you and assist you with registering a trading account.

The Company requests and acquires information on personal and financial details to be provided by a current / prospective clients, either on, but not limited to, relevant agreements and questionnaires in order to identify the client, create the Economic Profile of the client, verify the clients’ identity, provide, deliver and develop products and services, assess the Appropriateness for the services and / or products offered to clients by the Company, in order to service and maintain a clients’ account, process clients’ transactions, respond to relative and / or additional inquiries and / or clarifications to either the clients and / or their authorised representatives and to keep the client updated on any client business relationship relative matter and information on the Company’s services and / or products.

We may also collect information from you if you require technical assistance or customer support.

As part of our verification procedure which we perform in accordance with the requirements of the applicable laws and regulations, we also collect information necessary to verify your identity, such as an identification card, passport or driving license. This information can also be obtained or verified by matching it with background information we receive about you from public records / information databases or from other entities not affiliated with the Company.

Additional information we may (but not necessary shall) collect:

- location data and other IT communication data (including IP address and browser type) collected when you access and use our electronic trading platform(s) or website(s);
- information about devices that you use when accessing the platform(s) including unique device identified;
- products you trade and their performance, including the amount invested;
- pages (including the website and all of their inner pages / landing pages) visited and content viewed, links and buttons clicked, URLs visited before and after you visit our website (“the Web Data”). For more information about cookies and how to manage them please refer to **Section J the present Policy (Cookies)**;
- Information about the anticipated and actual volume and value of your transactions with us, payment methods and information provided in order to enable the construction of your Economic Profile;
- your telephone, email, SMS or Live Chat conversations with the Company’s customer support specialists;
- your social media profile details (name, profile photo and other information you make available to us, if any) when you connect with or contact us through a social media account; and
- information from third-party databases to comply with our legal and regulatory obligations. Information necessary to verify your identity, such as an identification card, passport or driving license. This also includes background information we receive about you from public records or from other entities not affiliated with the Company.

The Company collects the necessary information required to open, transact and safeguard your client money and your privacy and to provide you with the services you require. To this end, the Company gathers information from you and may, in certain circumstances, gather information from relevant banks and / or credit agencies, and / or other sources (such as compliance verification databases and similar service providers) as legally and regulatory obliged.

For the purposes of GDPR, the Company acts as data controller in respect of the personal data that we collect from you.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- Where you have provided your consent to allow us to use your data in a certain way; or
- Where the processing is necessary to carry out the performance of a contract with you; or
- Where the processing is necessary for us to comply with a legal and / or a regulatory obligation; or
- Where it is in our legitimate interest to perform our function.

D. HOW DO WE USE YOUR PERSONAL DATA?

The Company uses personal data only as required to comply with regulatory requirements and / or provide quality services to you. This information assists the Company to improve its services, customise browsing experience and enables it to inform its clients of additional products, services and / or promotions relevant to clients and in this respect the client needs to provide his / her consent to the usage of this data for such purposes (*see Appendix 1*). The Company processes your personal data for the following purposes:

- i. **ACCOUNT SETUP, VERIFICATION AND MANAGEMENT** We use personal information such as your name, ID / passport details, email address, phone number, and information about your device to open and administer your trading account with the Company, provide technical and customer support and training, verify your identity, process payment information and send you important information about your account with us and our service information. This information is required for the purposes of the Company complying with the laws and regulations applicable to it.

To verify your identity, age and accuracy of your registration details provided, we may disclose such information to third-parties e.g. financial institutions and third-party reference agencies and data verification service providers. This is required for the purpose of our complying with our legal obligations.

- ii. **COMPLAINTS** We may also use such personal information to consider any concerns or complaints you may have and / or in the event this becomes necessary for the purposes of any legal action or claim that you, or us, may have against each other in the context of our services provided.
- iii. **PERSONALISATION** Having acquired your consent, we may use your personal information, including but not limited to your professional background details and your account trading history, to determine, deliver and / or suggest tailored solutions to you, to personalise your experience with our services in line with your background, prior exposure to financial markets and your general experience in trading. This type of processing is necessary for the purposes of our legitimate interests in developing, delivering or presenting relevant personalized services and content to our customers.
- iv. **MARKETING** Subject to any preferences you may have expressed, we may use your personal information, including but not limited to your name, e-mail, address, phone number, location and web-data, to deliver marketing and event communications to you across various platforms, such as social networks, email, telephone, text messaging, direct mail, online, or otherwise. We will do this either, (i) until you withdraw your

consent (or it ceases to be valid) or, (ii) during the period of your relationship with us and, unless specifically instructed otherwise by you, for a reasonable period of time after the relationship has ended in order to inform you about products, services, promotions and special offers which we think may be of interest to you.

If we send you a marketing email or other marketing communication, it will include instructions on how to opt-out of receiving these marketing communications in the future. You can also manage your information and update your marketing preferences by emailing support@tradeo.com. Notes:

- We shall need up to seventy-two (72) hours to process any changes you make to your marketing preferences.
- We note that even if you opt-out of receiving marketing communications, we may still send you important information related to your account(s) with us and our services to you.

v. RISK MANAGEMENT In order to provide you our services and comply with our regulatory obligations we process your personal data as needed, to evaluate and manage risks to our business. The types of personal data that we may process for such purposes includes, but it is not limited to, your trading history and patterns (which may be required to identify and prevent abusive trading and / or other unlawful trading practices), your name, ID, passport and residence details.

vi. DIAGNOSTICS, RESEARCH AND DEVELOPMENT We may use your personal information for; internal research and development purposes, to help diagnose system problems, to administer our websites, to analyse, improve and test the features and functions of our services to you, to develop new content, products and services. Such processing is necessary for the purpose of our legitimate interests.

vii. LEGAL AND REGULATORY OBLIGATIONS We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, and / or investigation of a crime or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; and (c) to enforce the terms of the Agreement, or for the purposes of defending any claim you may have against us in connection with your trading with us.

viii. BUSINESS TRANSFERS We may sell, transfer or otherwise share some or all of our assets, including among others your Personal Information and Log Data, in connection with a merger, acquisition, reorganization or sale of all or substantially all of our shares or assets, or in the event of our bankruptcy.

ix. OTHER PURPOSES We may be required to use and retain your personal information for loss prevention or to protect our rights, privacy, safety, or property, or those of other persons in accordance with our legitimate interests.

E. PERSONAL DATA – MARKETING OPT-OUT

The Company uses personal data only as required to comply with regulatory requirements and / or provide quality service to you. We will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities without your consent.

The Company may market additional products, services and promotions relevant to you and the products and services you require if you have given consent to us for using data for such purposes. The processing of personal data may involve its transfer outside of the European Economic Area (EEA) to third countries where the level of protection of personal data is considered adequate as within the EEA.

We will ensure that, the transfer of personal data to such third countries will only take place following the implementation of a transfer mechanism as prescribed in applicable legislation.

If you do not want to receive marketing and / or promotional information of this nature for any reason, please contact us at the following address: support@tradeo.com. The Company will still send you important information about your account with it and the Company's service information.

F. PROTECTION OF PERSONAL DATA

Any personal information you provide us, will subject to our Terms and Conditions, be treated as confidential and shared only within the Company and will not be disclosed to any third-party, except under any regulatory requirement, legal obligation or legitimate interests as described elsewhere in the Privacy Policy.

The personal information that you provide in connection with registering yourself as a client of the Company is protected in many ways. You can access your trading account and profile through a password selected by you. Such password is encrypted and known only to you and shall not be revealed to anyone else.

The Company has in place reasonable commercial standards of technology and operational security to provide protection for all information provided by users from loss, misuse, alteration or destruction. Furthermore, the Company maintains physical, electronic and procedural safeguards that comply with applicable legal requirements and regulations for guarding our clients' personal information and any other information, to ensure that the clients' privacy is a major part of the Company's commitment to provide the finest services possible.

Account opening - registration information is safely stored on secure servers that only authorised personnel have access to, via password. The Company encrypts all personal information and makes all necessary effort to prevent unauthorised parties from viewing any such information and everything is stored on secure servers.

Employees are trained to respect the confidentiality of customer information and the privacy of individuals. We take the safeguarding of your data very seriously and will impose appropriate penalties, including dismissal where necessary for any breaches. We have appointed a **Data Protection Officer ("DPO")** to ensure that the management of personal information from our side, is in accordance with the present Privacy Policy and the applicable legislation.

While we will use all reasonable efforts to safeguard your information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

The Company has developed policies and procedures to identify and deal with data breaches, and if a breach is experienced, the **Commissioner** will be notified within seventy-two (72) hours.

G. YOUR RIGHTS UNDER GDPR (addressed to clients)

You have certain rights under GDPR which are detailed below. Some only apply under specific circumstances and are qualified in several respects by exemptions in Data Protection Bill. We will advise you in our response to your request if we are relying on any such exemption. For any request, please contact us at support@tradeo.com. In order to execute your request, we shall request from you to prove your identity through two (2) pieces of approved identification documents.

- i. **Access to personal data:** You have the right to submit a Subject Access Request ("SAR") for obtaining a copy of the personal information that we hold about you. In fulfilling such request of yours, we will request such other relevant information that will reasonably assist us. Information will be provided within one (1) calendar month

of the request, unless the request is complex, in which case we may notify you that an extension of up to two (2) calendar months is necessary. No fee will be charged for the first request, but a reasonable fee to cover administrative cost of providing further copies will be charged. If the request is unfounded or excessive, the Company has the right to refuse the request or charge a reasonable fee to deal with the request.

- ii. **Correction of personal data:** You can request from us to update any personal data that we are processing about you, which is incorrect. We will act within one (1) calendar month of request. We will independently verify your identity before any information is changed.
- iii. **Right to withdraw consent:** Where the Company has a genuine, lawful and legitimate interest for collection, processing and storing of data, we are unable to withdraw your consent which allows us to process your personal data. However, where we have relied upon your consent to process your personal data, you have the right to withdraw that consent. To opt-out of marketing (email and / or SMS), please contact us at support@tradeo.com.
- iv. **Right for erasure / to be forgotten:** You can request from us to erase your personal data where there is no compelling reason to continue processing. This right only applies in certain circumstances, it is not a guaranteed or absolute right (for example, we may be required to retain your data for legal and regulatory purposes which will take precedent).
- v. **Right to data portability:** This right allows you to obtain your personal data that you have provided to us with your consent or which was necessary for us to provide you with our products and services, in a format which enables you to transfer such personal data to another organisation. You may have the right to have your personal data transferred by us directly to that other organisation, if this is technically feasible.
- vi. **Right to restrict processing of personal data:** You have the right in certain circumstances to request that we suspend our processing of your personal data. Where we suspend our processing of your personal data, we will still be permitted to store your personal data, but any other processing of this information will require your consent, subject to certain exemptions.
- vii. **Right to object the processing of personal data:** You have the right to object the use of your personal data which is processed on the basis of our legitimate interests. However, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so, or we need to process your personal data in connection with any legal claims.
- viii. **Rights relating to automated decision making and profiling:** You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. Such right means that you can request that we involve one (1) of our employees or representatives in the decision-making process. We are satisfied that we do not make automated decisions of this nature.

H. SHARING PERSONAL DATA

Having acquired your consent, the Company may share information with third-parties in the event such information is reasonably required, or for legally or regulatory purposes in order to offer products and services that meet your needs, and which are delivered in a manner that is useful and relevant.

Other third parties your personal data may be shared with, may include, but are not limited to:

- an agent, professional advisor or service provider we engage to provide us with administrative, marketing, financial, insurance, research and other services such as our counter-party banks, liquidity providers, marketing agencies and IT service providers;
- organisations involved in a transfer or sale of our assets or business;
- financial institutions involved in managing our payments, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone whom you authorise us to disclose it to.

The Company will not disclose your personal information to third parties outside the EEA, without ensuring that:

- it has taken reasonable steps to ensure that the recipient has an adequate level of protection for the rights and freedoms of the data subjects in relation to the processing of personal data;
- the recipient is subject to a similar information privacy regime, and
- the prior authorisation from the Data Protection Commissioner of the Republic of Cyprus is obtained.

The Company does not sell, license, lease or otherwise disclose personal information to third-parties, except as described in the present Privacy Policy.

The Company reserves the right to disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide its services to you. To help the Company improve its services, we may engage third-parties to help carry out certain internal functions. Use of shared information may also be used to provide professional, legal, or accounting advice to the Company.

Where you may have been introduced to us by an Introducer, such an Introducer may have access to your personal information.

All third-parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a similar manner to the one that the Company protects personal information. The Company will not share personal information with third-parties that it considers will not afford its clients the required level of protection.

The Company shall not, share, disclose, engage and / or provide, from time to time, some and / or all of clients' personal information and / or data provided by its client(s) on an anonymous and / or aggregated basis only except where disclosure is made necessary, but not limited to, pursuant to a court decision or when disclosure of certain types of such information is required under the current applicable legislation, Regulatory and / or Supervisory Authorities within the Republic of Cyprus and / or for statistical purposes and / or for improving the Company's marketing requirements, including submission for Regulatory inspection(s) purposes to the Company's Regulator (i.e. CySEC). The Company will only use information of a confidential nature and / or disclose the same to any person and / or organisation in the following circumstances:

- i. where the Company is required by law and / or if requested by any Regulatory Authority and / or Exchange having control and / or jurisdiction over the Company;
- ii. in order to investigate and / or prevent fraud and / or other illegal activity in accordance with the applicable Laws within the Republic of Cyprus;

- iii. to any third-party only in connection with the provision(s) of services and / or products offered and / or provided to the client by the Company;
- iv. in accordance with the ancillary services provided to and / or the administration of the clients' account, including, without limitation, for the purposes of credit and / or identification enquiries and / or assessments;
- v. if it is in the public interest to disclose such information; and / or
- vi. at the clients' written request and / or with the clients written consent.

The Company's Clients agree and consent for the use of the initial information / data provided by them, during the initial account opening (establishment of a business relationship) with the Company, and when the client wishes and / or files an additional request and / or amendment(s), alteration(s) and / or service(s) in relation to account and / or services and products provided by the Company, provided that the initial KYC documentation supplied initially by the client is still up to date and / or complies with all legal requirements of the KYC documentation, policies, procedures and Manuals of the Company.

I. REGULATORY DISCLOSURE

The Company reserves the right to disclose personal data to third-parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and / or comply with such legal proceedings. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, the Company shall expressly inform the third-party regarding the confidential nature of the information.

The Company, as a regulated firm, is required to comply with certain obligations under the Intergovernmental Agreement with the United States and has taken all reasonable steps to be considered compliant with the Foreign Account Tax Compliance Act ("FATCA") and the Common Reporting Standard ("CRS"), approved by the Organisation for Economic Co-operation and Development ("OECD") for the exchange of information for tax purposes in line with the applicable Multilateral Competent Authority Agreement.

J. DATA RETENTION (incl. Log Data and Cookies)

The Company is legally obligated to keep personal data provided by you, including but not limited to your name, address, email, phone number, your trading / transaction / deposits / withdrawals history, for at least 5 (five) years after our business relationship with you has been terminated.

We will not keep your Information for any longer than is required, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

We will hold your personal data for the longest of the following periods:

- i. the period required for the performance of the relevant activity or services,
- ii. any retention period required by law,
- iii. the end of the period of any litigation and / or investigation by a public authority which arises in respect of the relevant activity and / or the services, or
- iv. where the Company has justifiable legitimate interest.

Please note that the data protection terms disclosed in the present policy, are part of the Terms and Conditions for the establishment of a business relationship with the Company. Any personal data collected, will be retained for carrying out the business relationship established between us.

If we hold any personal information in the form of a recorded communication, by telephone / electronic / in person or otherwise, such information will be held in line with local regulatory requirements which may either be five (5) years or, where required by law, ten (10) years after our relationship with you has terminated.

Restriction & Limitation of Liability

The Company and / or its employees shall not be held liable for any loss(es) and / or damage(s) including without limitation, indirect and / or consequential loss (es) and / or damage (s) arising from loss (es) of data and / or profit(s) arising out of and / or in connection with, the use of the Company's website. The material and / or information contained on the Company's website is solely for information purposes. Material and / or information on the Company's website, including, but not limited to, images, texts, policies, forms, agreements, is owned and / or otherwise provided by the Company; and should not be reproduced, and / or distributed and / or published in whole and / or in part for any purpose without the explicit written consent and / or permission of the Company. The material and / or information within the Company's website should not be interpreted and / or comprehended as an offer and / or a solicitation of an offer, to investment services / activities and / or any financial instruments.

The Company takes no responsibility for, and should not be liable for, the website being temporarily unavailable due to technical issues beyond the Company's control nor shall accept any liability for loss(es) and / or damage(s) as a result of reliance on the information contained within its website. Further, the Company is not liable for the privacy policies or the content of sites to which links are available, and where the Company has no control over the use or protection of information provided by clients or collected by those sites. Whenever a client elects to link to a co-branded website or to a linked website, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third-party and will be governed by the privacy policy of that third-party.

The Company's website may be accessed only via an EU Internet Protocol (IP) address (worldwide access not possible), however, the financial products mentioned on the website may not be allowed by law to all investors in all countries. Through this website you may be able to link to other websites which are not under the control of the Company. Such inclusion does not in any way imply any recommendation and / or endorsement from the Company in relation to the views expressed therein; they are only offered as a convenience to all visitors. The access to the website may be restricted to certain jurisdictions due to domestic legal restrictions. For such visitors and where users of the website subject to such legal restrictions are not allowed to access it, the Company bears no responsibility as well as to visitors or users or towards any individual who may access the website illegally.

The Company's website is not intended to constitute legal, investment, consulting, or other professional advice or services. The Client, before making any decision or taking any action that might affect his / her personal situation and / or business, should consult a qualified professional advisor.

Use of "Log Data"

When you access our Website, we collect information that your browser sends whenever you visit our website or an online service ("Log Data"). This Log Data may include, but is not limited to, your computer's Internet Protocol address, browser type, the web page you were visiting before you came to our website and information you search for, on our website. In addition, if you access our website via a mobile device, we may collect a PushID, subject to your consent as indicated by you in the mobile application, as well as a Mobile IP.

Use of "Cookies"

Our website, <https://tradeo.com/> web portal, and application form, use cookies to distinguish you from other users of our website. This helps us to provide you with a better experience when you navigate around our website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

The Company utilizes “cookies” to identify users when they connect to the site and to enhance the performance of the website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you have enabled the relevant function on your browser for accepting cookies. Cookies contain information that is transferred to your computer's hard drive. Cookies used by the Company do not contain personal information or other sensitive information. When a current or prospective client accesses the Company’s website a cookie is created and placed on the user’s machine. In addition to information related to authentication, information may be stored in the cookie in order to direct a user to the correct site location.

The Company may share web site anonymous usage statistics with reputable advertising companies, which can help us to improve your browsing experience on our website. It is noted that the information collected by such advertising companies is not personally identifiable. By continuing to browse our website, you are agreeing to our use of cookies. To administer and improve the website, the Company partners with third-parties to track and analyse usage and statistical volume information. The third-party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

We use **Google Analytics** on our website, a web analytics service provided by Google Inc. (“Google”). Google Analytics is used to help us obtain data regarding the use of Company’s website. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to and stored by Google on servers in the United States. Google will use this information for evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third-parties process the information on Google’s behalf. You may refuse the use of Cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full website functionality. By using the Company’s website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

We use the following cookies:

- **Strictly necessary cookies (session cookies).** These are cookies that are required for the operation of our website / web portal, and for example include cookies that enable you to log into the secure areas of our website / web portal.
- **Analytical / performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors navigate around our website when they use it. This helps us to improve the way our website works, and for example helps us ensure that users can easily find what they are looking for.
- **Functionality cookies (persistent cookies).** These are used to recognise you when you return to our website, and enable us to personalise our content for you, greet you by name and remember your preferences. The Cookies stored cannot harm your device, are anonymous, and unique to your browser.

Enable and / or Disable Cookies

Should the client wish to enable or disable cookies, the following instructions should be adhered to. It should be noted that in the cases where the client wishes to disable cookies, certain sections of our website might not work properly, and he / she may face difficulties logging-in or reviewing articles.

If you do not want to receive certain categories of cookies from our websites, you can opt-out of them. We will need to set a cookie so that we can remember your choices when you next visit the website from the same browser. At the present time it is not technically possible for us to allow you to carry your settings with you between all your browsers and devices, so you will need to change cookie settings from each browser you use.

Note: major part of the Company's website may work without cookies, but you will lose some features and functionality if you choose to disable cookies.

How the Client may enable and / or disable cookies using his / her browser:

a. Microsoft Internet Explorer 6.0, 7.0, 8.0, 10, 11

- Click on gear icon at the right top of your browser window and select 'Internet Options';
- In the options window navigate to the 'Privacy' tab;
- **To enable cookies:** Set the slider to 'Medium' or below;
- **To disable cookies:** Move the slider to the top to block all cookies;
- **Note:** there are various levels of cookie enablement and disablement in Internet Explorer. For more information on other cookie settings offered in Internet Explorer, please look for a "help" function in the browser or contact the browser provider.

b. Google Chrome

- Click the three dots icon on the right top browser window and select 'Settings';
- Click 'Advanced settings';
- In the "Privacy" section, click the 'Content settings' button;
- **To enable cookies:** in the "Cookies" section, tick 'Allow sites to save and read cookie data', this will enable both first-party and third-party cookies. To allow only first-party cookies tick 'Block all third-party cookies';
- **To disable cookies:** in the "Cookies" section, pick 'Block sites from setting any data';
- **Note:** there are various levels of cookie enablement and disablement in Chrome. For more information on other cookie settings offered in Chrome, please look for a "help" function in the browser or contact the browser provider.

c. Mozilla Firefox

- Click on 'Tools' at the browser menu and select 'Options';
- Select the Privacy panel;
- **To enable cookies:** Check 'Accept cookies for sites';
- **To disable cookies:** Uncheck 'Accept cookies for sites';
- **Note:** there are various levels of cookie enablement and disablement in Firefox. For more information on other cookie settings offered in Mozilla, please look for a "help" function in the browser or contact the browser provider.

d. Other Browsers

- Please look for a "help" function in the browser or contact the browser provider; and / or
- For more detailed information about cookies please visit www.allaboutcookies.org.

K. PRIVACY POLICY UPDATES

From time to time, the Company may update this Privacy Policy. In the event the Company materially changes this policy, including how we collect, process or use your personal data, the revised Privacy Policy will be posted on the Company's website for your information. The Company encourages clients to periodically access and review the present Policy so that the clients are always aware of what information the Company collects, how it used and to whom it may be disclosed. You are advised to consult this Privacy Policy regularly for any changes.

L. COMPLAINTS

If you think that we are using your information in a way which breaches the applicable data protection law, you have the right to lodge a complaint with our national data protection supervisory authority and contact the Commissioner for Personal Data Protection, at commissioner@dataprotection.gov.cy.

For any queries or further information in relation to the present Privacy Policy, please contact our Customer Support at support@tradeo.com.

M. APPENDICES

APPENDIX 1 - TRADEO MOBILE APPLICATIONS

This privacy policy appendix governs the use of any of the Company's mobile phone applications by you (the "Applications").

What information do the Applications obtain and how is it used?

User Provided Information

The Applications obtain the information you provide when you download and register through the Applications. Registration with us is optional. However, please keep in mind that you may not be able to use some of the features offered by the Applications unless you register with us.

When you register with us and use the Applications, you generally provide (a) your name, email address, age, user name, password and other registration information; (b) transaction-related information, such as when you make purchases, respond to any offers, or download or use applications from us; (c) information you provide us when you contact us for help; (d) credit card information for purchase and use of the Applications, and; (e) information you enter into our system when using the Applications, such as contact information and project management information.

We may also use the information you provided us, to contact you from time to time, to provide you with useful information, required notices and marketing promotions.

Automatically Collected Information

Furthermore, the Applications may collect certain information automatically, including, but not limited to:

- the type of mobile device you use;
- your mobile device unique device ID and / or the IP address and / or the operating system;
- the type of mobile Internet browser you use, and /or
- information about the way you use the Applications.

Does the Application collect precise real time location information of the device?

This Application does not collect precise information about the location of your mobile device.

Do third parties see and/or have access to information obtained by the Application?

Only aggregated, anonymized data may be periodically transmitted to external services to help us improve the Application and our services. We may share your information with third-parties only in the ways that are described in the present privacy policy.

We may disclose "User Provided Data" and "Automatically Collected Information":

- as required by law, such as to comply with a subpoena, or similar legal process; and / or
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; and / or
- with our trusted services providers who work on our behalf, and who do not have an independent use of the information we disclose to them, and who have agreed to adhere to the rules set forth in the present privacy policy; and / or

- in case the Company is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and / or a prominent notice on the Company website, of any change in ownership or uses of your information, as well as any options - rights you have regarding your information.

What are my opt-out rights?

You can stop all collection of information by the Applications easily by uninstalling the Applications. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request to opt-out, by submitting your email request to support@tradeo.com.

Data Retention Policy, Managing Your Information

We will retain “User Provided Data” for as long as you use the Applications and for a reasonable time thereafter. We will retain “Automatically Collected Information” for up to 24 months and thereafter may safely store it in aggregate form. If you’d like us to delete “User Provided Data” that you have provided via the Applications, please contact us at support@tradeo.com and we will respond within a reasonable time. Please note that some, or all the “User Provided Data” may be required for the Applications to function properly.

Children

We do not use the Applications to knowingly solicit data from, or market to children under the age of 13. If a parent or guardian becomes aware that, his or her child has provided us with information without their consent, he or she should contact us at support@tradeo.com. We will delete such information from our files within a reasonable time.

Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we maintain and process. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Applications. Please be aware that, although we endeavour to provide reasonable security for information we maintain and process; no security system can prevent all potential security breaches.

Changes

From time to time, the Company may update this Privacy Policy. In the event the Company materially changes this policy, including how we collect, process or use your personal data, the revised Privacy Policy will be posted on the Company’s website for your information. The Company encourages clients to periodically access and review the present Policy so that the clients are always aware of what information the Company collects, how it used and to whom it may be disclosed. You are advised to consult this Privacy Policy regularly for any changes.

Your Consent

By using the Applications, you are consenting to our processing of your information as set forth in the present privacy policy. Further to the definitions section of the present Privacy Policy, “Processing” may also mean using cookies on a computer / hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information.

Contact us

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at support@tradeo.com.