

PRIVACY POLICY

UR Trade Fix Ltd

Previous Version Date:	November 2019
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A. THE COMPANY

UR Trade Fix Ltd (hereafter “the Company” or “the CIF”) is authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (CIF) to offer certain investment and ancillary services and activities (found on the Company’s website and on CySEC’s website at www.cysec.gov.cy) under the Investment Services and Activities and Regulated Markets Law of 2017 L.87(1)/2017, as subsequently amended from time to time (“the Law”) and collects, processes and stores personal data of its actual and potential clients and website users through service offering.

The protection of privacy and the safeguarding of your personal and financial information is highly important for us. We are committed to protect individuals’ personal data in line with the requirements of applicable law. Therefore, any Personal Data that will be collected by the Company Ltd through this website, shall be processed according to General Data Protection Regulation 2016/679 (hereinafter the “GDPR”) that is applicable as of 25th May 2018, repealing the previous the Data Protection Directive 95/46/EC; as amended or replaced from time to time and the Law providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data, Law 125(I)/2018 which was adopted for the effective implementation of certain provision of the GDPR.

“Personal Data” means any information relating to an identified or identifiable natural person, whereas the Company acts as controller in relation to such personal data.

The purpose of this Policy is to explain to you:

- The purposes of the processing for which the personal data are intended as well as the legal basis for the processing
- 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.

B. PURPOSES OF DATA COLLECTION

Processing of your personal data is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

C. WHAT KIND OF PERSONAL DATA DO WE COLLECT

The Company collects personal data in a number of ways, for example from you when you sign up 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"> • Full Name • Address • Contact details (including telephone number, email and home address)

Documentary Data	<p>information about you that is stored in different documents / forms / copies of them, including but not limited to the below:</p> <ul style="list-style-type: none"> - identification documents i.e. your passport / identity card / driving license; - proof-of-residence documents e.g. bank statement / payslip / utility bill etc.; - source-of-funds documents e.g. tax return, corporate documents of your entity, trust deeds, power of attorney, credit checks etc.; - Appropriateness Assessment, Suitability Test, Economic Profile etc.
Personal specific-data	Gender and date of birth
Financial	<ul style="list-style-type: none"> • Your assets • Your income, financial position, net worth, source of wealth • Your employment details i.e. occupation, industry, employer name, status, history
Socio-Demographic	<ul style="list-style-type: none"> • Education • Profession • Details about your nationality
Contractual	Details regarding the services and / or products you offered to you including the amount invested;
Trading Transactional information	<ul style="list-style-type: none"> • Knowledge and experience in trading, risk tolerance, risk profile • Your bank account, e-wallet and credit card details
National identifier	Tax Identification Number / Code (TIN / TIC), country of tax residence
Location	<ul style="list-style-type: none"> • IP address • Country of the phone number you provided
Log Data	<ul style="list-style-type: none"> • IP address, browser type; • the web page(s) you were visiting before you came to our website; • information you search for, on our website. <p>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.</p>
Communication correspondence &	Details about you from email and / or mail correspondence and chats with us
Public Records and Open Sources	<p>Details about you i.e. when you are online</p> <p>Other publicly available records / information</p>
Consent / permission	Consents/ any permissions / preferences given to us by you
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.

Further to the above and in order for the Company to adhere and comply with the relevant legislative and regulatory requirements, including that of AML/CFT and the law on the provision of investment services, the exercise of investment activities and the operation of regulated markets (Law 87(I)/2017), the following personal data shall be collected and/or otherwise processed:

- 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 the client’s Economic Profile;
- your telephone, email, SMS or Live Chat conversations with the Company’s customer support specialists;
- information from other sources such as compliance verification databases to comply with our legal and regulatory obligations. Information necessary to verify your identity, such as an identification card or passport. This also includes background information we receive about you from public records or from other entities not affiliated with the Company.

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 and/or we may also collect information from you if you require technical assistance or customer support.

D. HOW DO WE USE YOUR PERSONAL DATA?

- a. **Provision of services** - we will use the Personal Data that you provide us for the provision and improvement of our services to you.
- b. **Marketing purposes/ Opt-out** – 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. Please be advised, that you are entitled to withdraw your consent and/or update your marketing preferences at any time by sending us an email at support@tradeo.com. 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. This will be required for the purposes of our (or a third party’s) legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
- c. **Analytics, surveys and research** - we are always trying to improve our services and think of new and exciting features for our users. From time to time, 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 unless our interests are overridden by your interests or fundamental rights and freedoms.

- d. **Protecting our interests** - we use your Personal Data when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of the Company its users and/or partners.
- e. **Compliance with legal and regulatory requirements** - we also use your Personal Data in order to comply with our regulatory requirements such as client identification or due diligence as stated in the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007-2018 and Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing, or to comply with our obligations regarding the Investment Services and Activities and Regulated Markets Law of 2017, Regulation (EU) No 600/2014, the Directive 2014/57/EU and the Regulation (EU) No 596/2014, or to comply with a subpoena or similar legal process.
- f. **Other Purposes** - We may be required to use and retain your personal information to protect our rights, privacy, safety, or property, or those of other persons in accordance with our legitimate interests except where our (or the third party's) legitimate interests are overridden by your interests or fundamental rights and freedoms.

E. WITH WHOM YOUR PERSONAL DATA IS SHARED

As part of using your personal information for the purposes set out above, we may disclose your personal information in the following circumstances:

- a. where required by law or a court order by a competent Court
- b. where requested by CySEC or any other supervisory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients
- c. to government bodies and law enforcement agencies where required by law and in response to other legal and regulatory request
- d. to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity
- e. where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority
- f. to such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services
- g. to payment service providers and banks processing your transactions
- h. to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well
- i. only to the extent required and only the contact details to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement
- j. to a Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR);

- k. only to the extent required, to other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form;
- l. to your authorized representatives
- m. to an Affiliate of the Company or any other company in the same group of the Company if applicable;
- n. to any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or other relevant agreements;
- o. to successors or assignees or transferees or buyers, with ten Business Days prior Written Notice to the Client; this will happen in the event that the Company decides to sell, transfer, assign or novate to a third party any or all of its rights, benefits or obligations under the Agreement with you or the performance of the entire Agreement subject to providing 15 Business Days Prior Written Notice to the Client. This may be done without limitation in the event of merger or acquisition of the Company with a third party, reorganisation of the Company, winding up of the Company or sale or transfer of all or part of the business or the assets of the Company to a third party.
- p. Client Information is disclosed in relation to US taxpayers to the Inland Revenue in Cyprus, which will in turn report this information to the IRS of the US according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between Cyprus and the US.
- q. We endeavor to disclose to these third parties only the minimum personal data that is required to perform their contractual obligations to us. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us.
- r. Our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

International Transfers – Transferring personal data to third parties outside the European Economic Area (the “EEA”):

The GDPR restricts transfers of personal data outside the EEA, or the protection of the GDPR, unless the rights of the individuals in respect of their personal data is protected and the relevant requirements of the GDPR are satisfied. In particular, transfers of personal data may be based on a decision issued by the European Commission which determines whether a country outside the European Union offers an adequate level of data protection (the “adequacy decision”).

In the absence of an adequacy decision, we may transfer personal data to a third country or international organization, only where we have provided “appropriate safeguards” and that enforceable rights and legal remedies for individuals are available. These appropriate safeguards ensure that both we and the receiver of the personal data are legally required to protect individuals’ rights. These safeguards include the following:

- a. A legally binding and enforceable instrument between public authorities or bodies;
- b. Binding corporate rules;
- c. Standard data protection clauses adopted by the European Commission;
- d. Standard data protection clauses adopted by a supervisory authority and approved by the European Commission;
- e. An approved code of conduct with binding and enforceable commitments of the receiver outside of the EEA;
- f. Certification under an approved certification mechanism together with binding and enforceable commitments of the receiver outside of the EEA.

In the absence of an adequacy decision or of any appropriate safeguards, the international transfer can take place only if it is covered by one (1) of the exceptions set out in Article 49 of the GDPR.

During the course of our business relationship, we may be required to transfer and/or transmit and/or disclose your personal data to third parties situated outside the EEA. Under such circumstances, we will take all appropriate measures in order to ensure that transfers outside of the EEA will comply with all the applicable requirements of the GDPR.

F. YOUR RIGHTS

Your rights under GDPR are listed below. However, please note that some only apply under specific circumstances and are qualified in several respects by exemptions in the Data Protection Legislation.

i. Right of access:

You have the right to submit a data subject access request and obtain a confirmation as to whether or not personal data concerning you are being processed. Where this is the case, you have the right to request access to your personal data and the following information:

- the purpose of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient we disclose the personal data to;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- the existence of your right to request rectification, erasure or restriction or to object to such processing;
- the right to lodge a complaint with the supervisory authority;
- information about the source of the data, where it was not obtained directly from you;
- the existence of automated decision making (including profiling); and
- the safeguards we provide in case we transfer personal data to a third country or international organization.

ii. Right to rectification/Correction of personal data:

You can request from us to update/rectify any personal data that we are processing about you, which is incorrect or to have incomplete personal data completed. We will act within one (1) calendar month of request. We will independently verify your identity before any information is changed, as set out above.

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. We will be obliged to erase your personal data without undue delay where one of the following grounds applies:

- your personal data is no longer necessary for the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based (i.e. the legal basis of the processing activity concerned is “consent”) and there is no other legal ground for the processing;

- you exercise your right to object and there are no overriding legitimate grounds for the processing in accordance with the requirements of the GDPR;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject; or
- where the personal data have been collected in relation to the offer of information society services rendered to in Article 8(1) of the GDPR.

However, kindly bear in mind that this right only applies in certain circumstances and it is not absolute right. For instance, we may be required to retain your personal data where processing is necessary for exercising the right of freedom of expression and information and/or for compliance with our legal and/or regulatory obligations.

v. **Right to data portability:**

This right allows you to receive the personal data you have provided to us, in a structured, machine readable format. Moreover, it enables you to request us to transfer such personal data directly to another controller, where this is technically feasible. However, please bear in mind that certain conditions shall be satisfied in order for this right to be applied (e.g. the lawful basis for processing such information shall be consent or the performance of a contract).

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. This means that you can limit the way we use and/or otherwise process your personal data. However, this right is not absolute. In particular, we are required to restrict the processing where one of the following applies:

- you contest the accuracy of your personal data for a period enabling us to verify the accuracy of such data;
- the data has been unlawfully processed and you oppose erasure and request restriction of their use instead;
- we no longer need your personal data for the purposes of the processing, but you need us to keep them in order to establish, exercise or defend a legal claim; or
- you have objected to processing your personal data (i.e. exercised the right to object in accordance with Article 21(1) of the GDPR) and we are considering whether our legitimate grounds override those of the individual.

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. Where we have restricted the processing in accordance with your relevant request, we will inform you before the restriction of processing is lifted.

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, this right is not absolute. We may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so which override your interests, rights and freedoms, or we need to process your personal data for the establishment, exercise and/or defence of legal claims.

Where personal data are processed for direct marketing purposes, you shall have the absolute right to object at any time to processing of your personal data for such marketing purposes.

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.

Information under such requests 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, in particular because of its repetitive character (i.e. this will be decided on a case-by-case basis) the Company has the right to refuse the request or charge a reasonable fee to deal with the request. In case we refuse to comply with your request, we will inform you without undue delay and within one (1) month of the request, about:

- the reasons for not taking action;
- your right to make a complaint to the supervisory authority; and
- your ability to seek to enforce your right through a judicial remedy.

G. AUTOMATED DECISION MAKING:

In order to perform the contact between us and as required by Law 87(I)/2017 and the relevant Circulars issued by CySEC, it is requested for the provision of the investment services to you, to assess your knowledge and experience, your financial situation and investment objectives.

We will fulfil the above requirements through the following tools:

Appropriateness Test: it takes place when you open an account as client of the Company. Hence, we need to check and ensure that you are suitable for the provision of the Company's services and products by taking an appropriateness test in regards to your knowledge, financial background and experience in financial services. Based on the scoring you receive, you will be informed whether you are eligible to receive our services and become our Client and the maximum level of leverage you are eligible to. The reason for assessing your appropriateness is to enable the Company to offer to you services suitable to you and act in the client's best interests.

The scorings above are monitored by the Compliance department of the Company. During these processes, the Company takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure personal data of the client.

H. DATA RETENTION

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. We will

keep records containing client personal data, trading information, account opening documents, communications and anything else for at least 5 years and up to 7 years (where it is requested by CySEC) from the end of our business relationship, as required by the Investment Services and Activities and Regulated Markets Law of 2017, the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007-2018 and Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing.

For more information on the retention period of a document or information, please contact us at support@tradeo.com.

I. 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. 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. Note that disabling cookies may result in restrictions when using our website and you may not be able to access some parts of this website.

We use the following cookies:

- **Strictly necessary cookies (session cookies).** These are the essential 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. These cookies are necessary for the running of our website, they cannot be disabled
- **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.

J. PRIVACY POLICY UPDATES

This policy may be changed from time to time. In the event that there are material changes, the Company will inform you via our Website or via email. Therefore, the Company encourages clients to periodically access the Company’s website and review the present Policy in order to be updated.

K. CONTACT DETAILS and COMPLAINTS

If you have any queries about the content of this Privacy Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us at compliance@tradeo.com.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint directly with our supervisory authority, the Office of the Commissioner for Personal Data Protection (the “Commissioner”) details below:

Address: 1 Iasonos str., 1082 Nicosia P.O.Box 23378, 1682 Nicosia,

Tel: +357 22818456 **Fax:** +357 22304565

Email: commissioner.dataprotection.gov.cy

Further information is available on the Commissioner website at <http://www.dataprotection.gov.cy>.