



Privacy Policy

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WHY DO WE HAVE A PRIVACY POLICY?

We understand the importance of honest and responsible use of your personal information. This Privacy Policy (“Policy”) explains how we collect, store, use and disclose personal information about you both in your day-



today dealings with us and when you visit our website. In this Policy, “the Company”, “we”, “our” and “us” means Neotrades Capital Ltd. For the purposes of this Policy, we have referred to the information that we collect about you as “personal information”. “**Personal Information**” means any information relating to an identified or identifiable natural person. The Company acts as a controller in relation to such personal information.

This Policy describes what types of personal information we collect about you when you choose to use our services, how we will use your personal information, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them.

AGREEING TO THIS PRIVACY POLICY

By accessing our website and using our services, you consent to the collection, storage, use, and disclosure of your personal information in accordance with this Policy.

WHAT PERSONAL INFORMATION DO WE COLLECT

As part of providing our products and services to you, we are required by AML Law (the Prevention and Suppression of Money laundering and Terrorist Financing Law as amended from time to time) to execute Know Your Customer (KYC) checks in order to verify your identity before we set you up as a client and we use those details to effectively manage your account with us to ensure that you get the best possible service. If you are an actual or potential client, we may collect the following types of information about you depending on your stage in the customer journey:

- identity data including title, first name, last name, date of birth, gender, account number or similar identifier, a copy of your national identity card or passport or driving license;
- contact data including billing address, a
- copy of a recent utility bill/bank statement (or similar) as evidence of your residential address, e-mail address and telephone number;
- information about your source of income and wealth including details about your assets and liabilities, account balances, trading statements, tax and financial statements, Tax residence and Tax Identification Number, government-issued documentation, employment and profession details, knowledge and experience in trading, risk tolerance and risk profile and other information we may consider necessary to our functions and activities in order to be in a position and be permitted to provide our services to you.;
- technical data including application software, internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites or applications;
- financial data including user ID tokens from payment service providers, bank account details and payment card details;
- profile data including your username and password, trading performance, transaction data, notes, your interests, preferences, customer feedback, survey responses, internet chats and telephone recordings;
- usage data including information about how you use our website, products, and services; and

marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences.

In case you are a corporate client we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary in order to be compliant with our legal and regulatory requirements.

If the Company requests you to provide it with personal information and you fail to do so, the Company may not be in a position to provide a service and/or enter into an agreement with you, in which case it will inform you accordingly.

HOW THE DATA IS COLLECTED

We obtain this information in a number of ways through your use of our services or other dealings with us including through any of our websites, account opening applications, contact forms, telephone, internet chat systems, our demo sign up forms and information provided in the course of ongoing client service correspondence. We may also collect information about you from third parties either through customer due diligence providers, sanctions screening providers, credit reference agencies, publicly available sources or screened third party data lists.

We also keep records of your trading behavior, including a record of:

- suspicious transactions and orders;
- your preference for certain types of products and services;
- your financial transactions, the products you trade with us and their performance;
- historical data about the trades and investments you have made including the amount invested.

USE OF DATA

We gather process and manage the information which allows us to perform our contractual obligations with you and to be compliant with our legal obligations. Below are the purposes for which your personal information is processed:

Performance of a contract

We process your data to provide you with our services and products, and to be able to complete our acceptance procedure in order to enter into a contractual relationship with our clients. In order to complete our client on-boarding we need to verify your identity, perform the customer due diligence as per the regulatory obligations, and we need to use the acquired details to effectively manage your trading account with Neotrades Capital.

Compliance with a legal obligation

A number of legal obligations are imposed by relevant laws to which we are subject, as well as statutory requirements, e.g., anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws.

For the purpose of safeguarding legitimate interests

Neotrades Capital processes personal data so as to safeguard the legitimate interests pursued by us or by a third party, where the legitimate interest is when we have a business or commercial reason to use your information. Nevertheless, it must not go unfairly against you and what is best for you. Examples of such processing activities include:

- Initiating court proceedings and preparing our defense in litigation procedures;
- means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures;
- measures to manage business and for further developing products and services;
- risk management.

For internal business purposes and record keeping

It may be required to process your personal data for internal business and record keeping purposes, which is in our own legitimate interest and is required in order to comply with our legal obligations. We will also keep records in order to ensure that you comply with your contractual obligations pursuant to the agreement governing our relationship with you.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you.

These recordings will be our sole property and will constitute evidence of the communications between us.

For legal notifications

Occasionally, the law requires us to advise you of certain changes to products and/or services or laws. We may need to inform you of the changes related to our products and services, therefore we will be obliged to process your personal information to send you the legal notifications. You will continue to receive this information even if you opt not to receive direct marketing information from us.

For Marketing Purposes

We may use your data for research and analysis purposes, and your trading history in order to deliver any analysis, reports, campaigns that may interest you to your registered e-mail address. In some cases, profiling is used, i.e., we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products. We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

Please note that you always have the right to change your option in case that you do not wish to receive such communications any longer.

To assist us in improving our products and services

We may use the personal information provided by you to ensure the highest standards when providing our products and services.

Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

DISCLOSURE OF YOUR PERSONAL INFORMATION

The Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

- a) where required by law or a court order by a competent Court;
- b) where requested by FSC or any other regulatory 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 requests;
- 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 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, e-mail 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) 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;
- k) only to the extent required, to market research call centres that provide telephone or email surveys with the purpose to improve the services of the Company, in such a case only the contact details will be provided;
- l) 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;
- m) to anyone authorised by you;
- n) to an Affiliate or introducing broker of the Company or any other company in the same group of the Company;
- o) to any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or other relevant agreements; and
- p) 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 10 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.

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your personal information while you have an account with us, or we are providing information, products, or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we have acted in accordance with the law; and
- to keep records as required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information and when it is no longer necessary to retain your personal information, we will delete or anonymize it.

PROTECTION OF INFORMATION

Safeguarding your personal information is important to us, whether you interact with us personally, via telephone, e-mail, post, over the internet or by any other electronic medium. We follow strict security procedures and protocols in connection with the storage, processing, and disclosure of your information, to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. We also have procedures in place to deal with any suspected or actual data security breach and

will notify you and any applicable regulator of a data security breach where we are legally required to do so. Where we share your information with a third party (which we will only do in accordance with this privacy policy), we will ensure that the security measures employed by any such third party in relation to the storage and processing of your information are at least as rigorous as those employed by us. Additionally, the Company limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's personal data on the Company's instructions, and they are subject to a duty of confidentiality.

We continually review our systems and follow best practice industry standards for information security.

YOUR RIGHTS AS A DATA SUBJECT

Right of access – you have the right to request from us to provide you with a copy of the personal information that we hold about you.

Right of rectification – you have a right to request from us to correct the personal information we hold about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal information from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies the Company acting as your controller will erase your personal information from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal information.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply the Company will transfer your personal data to another organization.

Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

COOKIES

The Company uses Cookies for its website. Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website and can be accessed either by the web server or the client computer. Cookies may be used on some pages of the Site for us to provide Site users with a more customized web browsing experience.

POLICY REVIEW AND CHANGES

Our privacy policy will be reviewed from time to time to take account any new obligations, technological advancements, changes to our operations or practices and to make sure it remains appropriate to the changing regulatory landscape. We may make changes to this Policy from time to time and it is important that you check this Policy for any updates on the Company's website. The Company will keep on its website all the versions of this Privacy Policy for your reference. Any personal information we hold will be governed by our current Privacy Policy. Please note that this policy is addressed to customers and potential customers

CONTACTING US ABOUT THIS POLICY OR MAKING A COMPLAINT

If you have any queries about the contents of this Policy, or wish to inform us of a change or correction to your personal information/data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

E-mail: complaints@neotrades.com

We will try to respond to your request without undue delay and in any case within one month of receipt of the request. In case that your request takes us longer than one month we will notify you accordingly and keep you updated. In this respect it should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. Nonetheless and where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either:

- (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; **or**
- (b) refuse to act on the request.