

# PRIVACY POLICY

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## 1. INTRODUCTION

- 1.1. At Trading Moon (the “Company”, “us”, “we”, “our”, “ours” or “ourselves” as appropriate) we care about your privacy. The purpose of our Privacy Policy (the “Policy”) is to describe to you what data we collect, how we collect it, and how and why we use your personal data. It also describes options for you to access, modify, delete or otherwise control the personal data that we have collected on you.
- 1.2. By accepting this Policy, the client (the “Client” “you”, or “yours as appropriate) agrees to be governed by the conditions that follow, as well as the applicable laws. This Policy is intended for current and prospective customers, including employees, Trading Moon contractors, or a third-party service provider of Trading Moon, any personal information we collect will be used in connection with your employment contract, contractual relationship, or in accordance with our separate rules, which are available by contacting us.

## 2. WHAT PERSONAL DATA DO WE COLLECT

- 2.1. We collect the necessary information required to open a client’s trading account, and to provide clients with the services they require. We may collect certain personal information including but not limited to:

Categories of personal data	Descriptions
Marital status, ID, identification data, images, etc.	Last names, names and addresses, passport or ID cards images, job title, mobile number, email address, birth date, criminal records, IP address, etc.
Economic and financial information (income, financial situation, tax situation, etc.)	Bank account details, personal tax identification numbers, source of funds/ wealth, e-wallets account details/ credit card details, CRS/ FATCA declaration (self-certifications form), transaction history (withdrawal/ deposits), trading history (Account ID, Net deposits (first time), most traded symbols), etc.
Social Security Number (or NIR)	Social security numbers or personal numbers or National Insurance Number, etc.

## 3. HOW WE COLLECT YOUR PERSONAL INFORMATION

- 3.1. Direct Interactions. You provide us with personal information through completion of the registration process, upload identity documents, carry out transactions, communicate through instant live-chat, telephone or email.
- 3.2. Use of automated technologies or interactions. When using our services, your device automatically transmits to us its technical characteristics. Locale is implemented for smooth processing of your personal information to produce the best possible service while using our platforms.
- 3.3. Use of our web services. We retain data from IP address, cookies files, browser data or operating system used, the date and time of access to the site, and the requested pages addresses allows us to provide you with the optimal operation on our web application, mobile app and/or desktop versions of our application and monitor your behaviour for the purpose of improving the efficiency and usability of our services.

#### **4. HOW WE USE YOUR PERSONAL INFORMATION**

- 4.1. Your personal information may be used as well as disclosed by us as follows:
- 4.1.1. Payments, trading, communication, electronic verification apps and platforms providers which are provided to us by third parties: Trustly Group, Sofort GmbH, Neteller, Skrill, Swish, AppsFlyers, BankID, Trulioo and other providers with whom we have contractual agreements;
  - 4.1.2. Consultants and other service providers who have been contracted to provide us with services such as administrative, online marketing, analytics, and financial, regulatory, compliance, insurance or other services;
  - 4.1.3. Introducing brokers and affiliates with whom we have a mutual relationship;
  - 4.1.4. Competent authorities, and third-party providers (auditors or contractors or other consultancy firms) where such disclosure is required in order to enforce or apply our Client Agreement or other relevant agreements;
  - 4.1.5. Payment service providers, credit card processors and banks processing your transactions;
  - 4.1.6. Other companies within the same group of companies which provide financial, technical and other services; and
  - 4.1.7. Any person authorised by you through a limited power of attorney.
- 4.2. We endeavour 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.
- 4.3. 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.
- 4.4. We may process your information in accordance with the principles of lawfulness, fairness, transparency, and always adhering to the intended purpose of data processing, the principle of data minimization, accuracy, limited data storage, data integrity, confidentiality and accountability.
- 4.5. We record and store personal information in hard copy files, electronic devices (computers, laptops, servers) and other records where we endeavour to protect it from damages, loss, internal or external-fraud, unauthorised access, modification or disclosure.
- 4.6. The Company may keep your personal data for longer than seven (7) years of the termination of the business relationship for legal, regulatory and/or any other obligatory reason. 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.

#### **5. CONSENT AND ACKNOWLEDGEMENT OF DATA SUBJECT**

- 5.1. We may process your personal data for one or more legal and lawful basis of processing (“Lawful Basis”) determined by each purpose for which we may require your personal data.
- 5.2. We are obliged on legal and lawful basis to obtain your consent in connection to the following:
- 5.2.1. to perform our contractual obligations towards you
  - 5.2.2. to be compliant with the legal and regulatory requirements

### 5.2.3. to pursue our legitimate interests

5.3. Where our use of your personal information does not fall under one of these three lawful bases we require your consent. Your free consent shall be required in this event, and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this Notice or by withdrawing your consent.

You agree we may use personal data provided by you through our website or otherwise and personal data provided during our business relationship to communicate with you for marketing promotional purposes as well as to provide you with market news and analytical reports through different channels like include calling you, sending emails, notifications through your online account portal and sms notifications including push notifications.

5.4. We have the obligation to collect and store your personal information in accordance with the Anti-money laundry laws and regulation. This information is referred to as Know Your Client information which is performed through our customer due diligence process of identifying and verifying your personal identity, transactional, financial, and other data.

## 6. THIRD-PARTY CONTENT ON OUR WEBSITE AND SECURITY MEASURES

6.1. We may provide links to third-party websites in our website, and such websites are not under our control. We cannot accept responsibility for the conduct of third-parties linked to our website, including without limitation the collection or disclosure of your personal information. Before disclosing your personal information on any other website, we encourage you to read their privacy policy as well as terms and conditions for the use of their website.

6.2. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party, and those sites are not subject to our privacy standards and procedures.

6.3. In the event of any data breach which poses risk to your personal information, we will notify you within 72 hours of first having become aware of such breach (without undue delay).

6.4. The cookie may be enabled to gather, use and manage data from mobile devices through software that uses advanced encryption mechanisms. Such information includes the brand, type and hardware token of the mobile device transferred to us during registration of the device in the application and it is used for explicit identification of the applicant or application and the mobile device.

6.5. The Company's services are not available for persons who are not of a legal age ("Minors"). We disclaim any liability for any unauthorised use by minors of our online services, trading platform in any manner or another.

## 7. COOKIES

7.1. Trading Moon uses cookies to gather information about your access to this Website and other services we provide to you. Cookies collect information about how visitors use the site, for instance which pages visitors go to most often, and if they get error messages from web pages. Cookies may be used on some pages of the site for us to provide you with a more customised web browsing experience. They are not used to determine the personal identity of anyone merely visiting the site..

7.2. Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse cookies. However, this may impair the quality of services we provide to you.

## 8. WHAT ARE YOUR PRIVACY RIGHTS?

8.1. Subject to certain conditions and according to the applicable data protection laws, you may have the right to be informed and/or request from the Company access to and correction/rectification and/or processing restriction and/or erasure of your personal data and/or to object to processing of

your personal data (e.g. for marketing purposes) as well the right to withdraw consent (where applicable). Such personal data are collected for the purposes of compliance by the Applicable Regulations and Your refusal to provide the information requested may result in rejection or/and your account(s) closure.

- 8.2. If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honoured only to the extent it is no longer necessary for any services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

## **9. HOW TO RESOLVE A COMPLAINT**

- 9.1. Your possible privacy concerns are important to us. We are committed to resolving any complaint and to attending to answering general questions about our services or personal information that we collect, store and how it is used. If you are not satisfied with our response to your complaint, you have the right to further submit a complaint with the Office of Commissioner for Personal Data Protection or our Supervisory Authority. You may further submit a complaint with your Personal Data Protection Authority in your country of residence.
- 9.2. We will promptly respond to your requests, but depending on the complexity or number of requests we revert back to you in less than a month of the receipt of your request and keep you updated.
- 9.3. You may exercise your right by submitting written complaints or general questions about your personal information by emailing to: [dpo@tradingmoon.com](mailto:dpo@tradingmoon.com).

## **10. ACCOUNT DELETION PROCESS**

- 10.1. If you decide to delete your Tradingmoon account, you shall contact our support team by [support@tradingmoon.com](mailto:support@tradingmoon.com) from your email address associated with your Tradingmoon account.
- 10.2. Once the deletion process is completed, a record of your personal data will be kept in accordance with the minimum period of retainment of personal data as per the laws and regulations. Following the retention period, your personal information will be deleted automatically.

## **11. POLICY REVIEW**

- 11.1. We reserve the right to modify this Policy at any time. When we make any modifications to our Policy, we will notify you and/or put a notification in a place on our website that we find appropriate. This is so you are aware of what information we collect, how we use it, and under what circumstances, if any, that we disclose