

1. Introduction

Tradernet Ltd (hereinafter referred to as the “**Company**”) is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“**CySEC**”) under license number 219/13 obtained on 30/10/2013. The Company is located at Vasileos Georgiou A, 35-35R Y&K PAPAS, Office 35E, Limassol, 4040, Cyprus.

Tradernet Ltd and its related entities are responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

2. The collection of personal information

The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from (prospective) clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies, and/or fraud prevention agencies, and/or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively.

The Company is using sophisticated commercial database allows continuous screening of clients to identify individuals and companies can be considered as PEPs or suspected and convicted of money laundering, terrorism financing, drug trafficking and other illicit activities within business relationships. Information is aggregated from all relevant sanction and embargo lists, from over 600 enforcement agencies, from countless court cases and other open source intelligence resources from around the world.

The information the Company collects might include the client’s name, surname, address, e-mail address, phone number; date of birth, gender, nationality; occupation and employment details; financial information such as income, assets and net worth, source of funds; tax relevant information; IP address and other location data; bank account information, e-wallets and credit card details; documents that the client has to provide for verification of its identity, such as passport/identity card, utility bills and/or bank statement and historical data of client’s transactions including, trading history or investments company incorporation details and other supporting documents if the applicant is a legal entity. In addition the Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.

When the client accesses or uses the Company’s Services, the Company automatically collects information about the client, including:

- **Log Information:** The Company collects log information about the client’s use of the Services, including the type of browser the client uses, app version, access times, pages viewed, the client’s IP address, any other network identifiers, and the page the client visited before navigating to the Company’s Services.

- **Device Information:** The Company collects information about the computer or mobile device the client uses to access the Company's Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Activities on the Site:** The Company collects records of activities on the Site, including, any content the client posts, the client account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.
- **Location Information:** In accordance with the client's device permissions, the Company may collect information about the precise location of the client's device.
- **Information Collected by Cookies and Other Tracking Technologies:** The Company uses different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on the client's hard drive or in device memory that help the Company improve the Services and the client's experience, see which areas and features of the Services are popular and count visits. Web beacons are electronic images that may be used in the Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

3. Usage of personal information and lawful basis

The Company will use, store, process and handle your Data in accordance with the Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR"), 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 of 2018 (Law 125(I)/2018), as amended from time to time and/or any other relevant legislation and/or regulations (hereinafter collectively referred to as the "Data Protection Legislation").

The Company collects and process personal data which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the Client. In some cases, the Company may also process the client's personal data to pursue its legitimate interests or those of third parties, provided that the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

In view of the above, the Company may use client's personal information for one or more of the following purposes to confirm/verify its identity; to process transactions; trading account management; for internal business as well as record keeping purposes; to analyse statistical data; to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation; to defend possible legal claims and/or comply with court orders, judicial processes and or any other requirements of a competent authority;

The Company also needs to comply with the Anti-Money Laundering regulations therefore there are documents that must be kept to be able for the Company to demonstrate to the authorities that has acted in accordance with the legislation.

Furthermore, the Company uses clients' personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes.

If there is no lawful basis, for the usage of client's personal data as indicated above, the client's consent will be required.

4. Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and will not be disclosed to any third party except in the circumstances mentioned in the below sections.

5. Disclosure of information to Affiliates and Partners

The Company may share information with affiliates or any other company in the same group of the Company in the event such information is reasonably required in order to provide the products or services to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.

6. Disclosure of information to Non-affiliated third parties

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described below:

- a) Where required by law or a court order by a competent Court; in case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority;
- b) Where requested by CySEC 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 relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- d) To such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services;
- e) To credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
- f) To the Company's professional advisors 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;
- g) 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;
- h) To third parties engaging with the Company to help carry out certain internal functions such as account processing, fulfilment, client service, or other data collection activities relevant to the Company's business;

- i) To credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients;
- 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) 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 market research call centres that provide telephone or electronic mail (e-mail) surveys with the purpose to improve the services of the Company, in such a case only the contact details data will be provided;
- m) 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;
- n) At the Client's request or with the Client's consent;
- o) To permitted successors or assignees or transferees or buyers, with fifteen (15) Business Days prior written notice to the Client;
- p) Client Information is disclosed in relation to US taxpayers to the Inland Revenue in the Republic of Cyprus, which will in turn report this information to the Internal Revenue Service (IRS) of the U.S. according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between the Republic of Cyprus and the U.S.
- q) Client information is disclosed in compliance with the common reporting standard (CRS) for the automatic exchange of financial account information developed by the Global Forum of the Organization for Economic Co-Operation and Development (OECD); in the cases where your tax residence is located outside Cyprus, the Company may be legally obliged to pass on the information and other financial information with respect to your financial accounts to Cyprus tax authorities and they may exchange this information with tax authorities of another jurisdiction or jurisdictions pursuant to intergovernmental agreements to exchange financial account information. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. 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 manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

7. Transfer of personal data outside the European Economic Area ("EU")

The Company's aim is to safeguard Personal Data when these are to be transferred outside the EU if adequate protective measures are established, appropriate to the safeguards dictated by Data Protection Legislation. The third parties that the Company may transmit shall comply with the Data Protection Laws or the legislation of their jurisdiction which has equivalent arrangements.

The Client agrees to the transfer and/or processing of its personal data outside the EU, as described in this section, by providing its acceptance during the account opening process and the submission of the information required to open and maintain an account with the Company.

8. Recording of Telephone Conversations and Electronic Communications

Telephone conversations and electronic communications between the client and the Company will be recorded and kept by the Company for a period of up to five (5) years, unless otherwise provided by law, and recordings will be the sole property of the Company. The client accepts such recordings as conclusive evidence of conversations so recorded. Such recordings shall be provided to the client upon request.

9. Contact Clients

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company's contract for differences trading. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone +357 25257780 or email customers@tradernet.com.cy sakharov@tradernet.com.cy and requesting that no further contact on behalf of the Company be made.

10. Data Protection Rights

Clients have certain data protection rights, described in more detail in the Company's Privacy Statement which can be found in the company's website [please provide the link]. These include, among others, the following:

(A) Right of access to their personal data

Clients are entitled to obtain from the Company a confirmation as to whether or not personal data concerning the client are being processed, and where that is the case, the client is entitled to access all their personal data and be provided with further information and details regarding the processing.

(B) Right of rectification

Clients are entitled to request, without undue delay the rectification or inaccurate personal data and/or the completion of any incomplete personal data.

(C) Right of erasure

Clients have the right to request the erasing of all their personal data from the Company, however the Company is permitted to erase Clients' data if it is held under the legal lawful bases:

- personal data are no longer required in relation to the purposes for which they were originally collected or processed;
- we relied on the client's consent as the basis for processing and the client withdraws his/her consent, if there is no other ground for the processing;
- we processed the personal data unlawfully;
- we are under a legal obligation to erase his/her personal data;

- the client has objected to the processing of his/her personal data (*right of objection*) and there are no overriding legitimate grounds for the processing or the client objects to our processing for direct marketing purposes.

(D) Right of restriction of processing

The Client may ask us to restrict the processing of his/her personal data, under the following circumstances:

- The client contests the accuracy of his/her personal data, for a period enabling to verify the accuracy of his/her personal data;
- the processing is unlawful, and the client opposes the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- the client has objected to processing (*right of objection*) pending the verification whether our legitimate grounds override his/hers.

(E) Right of objection

The Client is entitled to object and ask us to stop processing his/her personal data at any time, and we will do so, if:

- we are relying on our legitimate interests (or those of a third party) to process his/her personal data, except where we can demonstrate compelling legitimate grounds for such processing, which override his/her interests, rights and freedoms or for the establishment, exercise or defence of legal claims;
- personal data concerning the client is processed for direct marketing purposes including profiling to the extent that is related to such direct marketing.

Where the client objects to our processing for direct marketing purposes, his/her personal data shall no longer be processed for such purposes.

(F) Right to data portability

The Client is entitled to receive his/her personal data which he/she may have provided to us in a structured, commonly used and machine-readable format and to transmit these elsewhere or to ask us to transfer them, where technically feasible, to a third party of his/her choice, without hindrance from us, where:

- Our processing is based on his/her consent; and
- We carry out such processing by automated means.

Kindly note, that under all circumstances, the exercise of such right to shall not, in any circumstances, adversely affect the rights and freedoms of others.

11. Restriction of responsibility

The Company is not responsible for the privacy policies or the content of sites to which <https://tradernet.com.cy> links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, 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.

12. Use of "COOKIES"

The Company uses cookies to secure clients' trading activities and to enhance the performance of the <https://tradernet.com.cy> web site. Cookies used by the Company do not contain personal information or other sensitive information.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the <https://tradernet.com.cy> web site, the Company may use 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.

13. Mailing list

When the Client opens a trading account with the Company, he agrees to joining the Company's mailing list in order to receive company news, product updates, and analysis & research updates. If the Client wishes to unsubscribe from the mailing list, he must inform the Company by email at customers@tradernet.com.cy

14. Record Keeping

Under Applicable Regulations, the Company will keep records containing Client personal data, trading information, Client's Trading Account(s) opening documents, communications and anything else which relates to the Client for at least five (5) years after termination of the Agreement. Telephone communications and electronic communications between the Client and the Company may be kept by the Company for a period of up to seven (7) years where requested by CySEC.

15. Privacy Policy Updates

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded in the Company's website. In this respect, the Company shall send any new version of the present Policy to its existing clients for their further acceptance, every time a change is effected.

16. Data Protection Notice

The Client may seek additional information on the terms and conditions of the processing of its data by the Company, in the Company's [Data Protection Notice](#).