

DATA PROTECTION AND PRIVACY POLICY

1. Introduction

Tradestone Ltd (hereinafter the “**Company**”, “**we**”, “**our**” or “**us**”) is a Cyprus Investment Firm (hereinafter the “**CIF**”) regulated by the Cyprus Securities and Exchange Commission (hereinafter the “**CySEC**”) under license number 331/17 and registered with the Registrar of Companies and Official Receiver in Cyprus under registration number HE353534.

The Company is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus for the purpose of personal data processing.

The protection of the security and privacy of your personal information is important to us and to the way we conduct our business in compliance with the laws on privacy, data protection and data security.

1.1 Purpose

The purpose of this policy is to outline what information the Company may collect, how it uses and safeguards that information and with whom it may share it.

By registering with the Company’s website, you consent to the collection, use and processing of your personal data.

We collect, use, disclose, store and process your personal data for the performance of our services as required by law. We use your personal data to provide you with the services you request through our website(s) and platform(s) to perform our contractual obligations related to those services in accordance with the Processing of Personal Data (Protection of the Individual) Law of 2001, as this is amended or replaced from time to time.

1.2 Data Protection Act

The Company may process information relating to you, including holding such information in hard-copy records or electronic database, to satisfy any contractual, regulatory or statutory requirements we may have. By opening a trading account with the Company, the client hereby gives consent to such collection, processing, storage and use of personal information by the Company as extendedly explained below. Unless we receive specific written instructions for the contrary, by providing this information you agree that we may process this information in order to fulfil such obligations.

2. Personally Identifiable Information





The information we collect during the on-boarding process may include but is not limited to your full name, e-mail, country of residence, contact numbers, tax identification numbers, financial information and so forth (hereinafter the “**Personal Information**”). During this process we are also required by law to collect certain documentation in order to verify your true identity which may include but is not limited to, proof of identity in the form of a Passport or Identification Card, proof of your permanent residential address in the form of a utility bill as well as your credit card details (we request both sides of the bank card. The front side must contain the first 6 digits and the last 4 digits of the card number, cardholder’s name, and expiry date. For security purposes, we request clients to cover the CVC/CVV codes at the back side). User’s card data are not stored in our systems, since we do not have a PCI DSS certificate. For all that information we rely on our Payment Providers who are duly certified.

Through its website(s), the Company will not collect any Personal Information, unless you voluntarily choose to provide it (e.g. by registration, email enquiry, survey). If you do not want your personal information to be collected, please do not submit it.

By submitting your Personal Information, you grant us with your consent to use your Personal Information in the ways listed below. You also consent to the Company, transferring your Personal Information outside the European Economic Area where it is necessary for Tradestone Ltd to fulfil its contractual, regulatory and legal obligations, according to the provisions of Processing of Personal Data (Protection of the Individual) Law of 2001. We will only transfer Personal Information to organizations outside the EEA upon our assessment that the organization we are sending the information to, has proper and appropriate controls and safeguards in place.

2.1 How does the Company use your information

We may use your information for any one or more of the following purposes:

-  to confirm your identity;
-  to maintain your personal profile;
-  to manage your account and keep you updated on all matters that concern your account;
-  to provide the services that you have requested including processing transactions;

- ✚ to contact you when necessary or appropriate in relation to the services being provided to you;
- ✚ to provide you with information about our products and services and provide you with information or opportunities that we believe might be relevant for you;
- ✚ to tailor the website or other service we provide to you relating to your needs and interests; and
- ✚ to create anonymous statistical data.

2.2 What you are entitled to

- ✚ Request your personal data to be obliterated through the “**right to be forgotten**” where there is no good reason for us in continuing to process it, however please take note that we may not always be able to comply with such a request due to our regulatory obligations towards the CySEC whereby we have an obligation to retain data in our records/files for up to seven (7) years;
- ✚ Request the withdrawal of your consent however please note that in the event you decide to do so we may not be able to provide you with our services; and
- ✚ You have the right to access your Personal Information. Should you decide that you wish to receive a copy of your Personal Information that we hold on you we will do so upon a written request by you unless any regulatory obligations prevent us from doing so.

You may opt out of receiving marketing emails at any time by selecting the 'unsubscribe' link at the top of the emails or upon request by contacting by email our Customer Support team (please find the contact details on the Contacts page).

3. Contacting Clients

From time to time the Company may contact clients either by phone or email for the purpose of administering the terms of the Agreement between us and you as the client. Additionally, the Company may, on occasion, seek to contact clients, either by phone or by email, for the purpose of informing them about unique promotional offerings provided by the Company to the client. Clients consent to the acceptance of such communication when they accept our terms and conditions of use while registering with the Company. Any person wishing to opt out of further contacting by the Company, at any time whatsoever, is entitled to do so and may express his wish, simply by contacting the Company either by phone or email to request that no further contacting on behalf of the Company be made.

3.1 Non-Personal Information Collected Automatically

When you access the company's website(s), we may automatically (i.e. not necessarily with registration) collect statistical information that is not personally identifiable (e.g. type of internet browser and computer operating system used; domain name of the website you come from; number of visits, average time spent, pages viewed, etc.). The Company may use this information and share it within the Company's group for statistical reasons (i.e. measure the use of its website and/or improve its content).

4. Disclosure of Information

4.1 Who may we disclose Personal Information to

Your Personal Information may be disclosed to:

- ✚ the Cyprus Securities and Exchange Commission (CySEC) and other regulatory and governmental bodies the Company is required by law to disclose information to;
- ✚ financial institutions and other similar organizations that the Company deals with in the course of its business;
- ✚ service providers and specializing advisors that provide services to us (out-sourcing partners);
- ✚ any third parties where it is required to process a transaction or provide services the client has requested;
- ✚ introducing brokers or other brokers who had been contracted to provide us with administrative, financial, insurance, research and/or other services;
- ✚ credit providers, courts, tribunals and regulatory authorities as agreed and/or authorized by law;
- ✚ credit reporting or reference agencies; and
- ✚ anyone authorized by the client (such as the client's financial advisor, broker, solicitor or accountant).

Please note that we will never sell or provide the client's Personal Information to third parties for marketing purposes.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose.

In general, we require that any third-party service provider that we share any Personal Information with, undertakes to respect any individual's right to privacy and comply with the Data Protection Principles. These third-party service providers may keep a record of any searches they performed on our behalf and they may use the search details to assist other companies in performing their own searches. Third parties are not covered by this privacy policy.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

4.2 Third Party Sites

Please be notified that Tradestone Ltd cannot be held responsible for the privacy practices of other web sites. We advise all visitors to be aware and read the privacy statements of each and every web site that collects personal identity information.

4.3 Payment Providers

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption - TLS 1.2 and application layer with algorithm AES and key length 256 bit.

4.4 Retention of records

We may be requested to retain and use your Personal Information to meet our legal obligations for data security purposes and as we believe to be fit and necessary or appropriate in order to either but not limited to comply with our requirements under applicable laws and regulations, to respond to requests from courts and/or other public and governmental authorities, for monitoring purposes through compliance and anti-money laundering processes.

We will not keep your information for any longer than the time required. In many cases, information must be kept for considerable periods of time. Retention periods will be decided, considering 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. Under applicable regulations, we will keep records containing Personal Information, trading information, account opening documents, communication and anything else that is relative to the Client for a maximum of seven (7) years after termination of the Agreement between you and our company. In any event, we will keep your information for a minimum duration as provided in the applicable Limitation of Actions Law.

4.5 Security

The Company takes precautions to ensure the security of your personal information and strives to keep it accurate.

We act with care to protect the client's personal information from loss, destruction, falsification, manipulation, and unauthorized access or unauthorized disclosure and has developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying and unauthorized disclosure, use or modification.

Access to Personal Information is limited to the company employees and authorized service providers who require to receive it in order to perform their work.

While we will use all reasonable efforts to safeguard the client's information, the client acknowledges that the use of the internet is not entirely secure and therefore, we cannot provide any guarantee concerning the security or integrity of any personal data transferred from the client, or to the client through the use of the internet.

5. Cookies

5.1 General

Cookies are small pieces of data sent from a website and stored in a user's web browser whilst the user is browsing that website.

5.2 How we use Cookies on our Site and what Information we collect.

Like most websites, the Company uses cookies to improve the client's experience on our website as the data received from cookies enables us to determine the type of browser and settings the client is using, when he has been on our website, when he returns to the website, where he came from and to ensure his information is secure. We do not link the information we store in cookies to any personal identification information the client submits while on our site. If he chooses to opt out of cookies the client may still use our site, but the ability to use some areas will be limited.

We would strongly recommend that the client allows cookies on our website to receive the best experience possible. Turning off cookies may result in reduced performance of our website and trading platform, however if he would still like to opt out of cookies, he can do this through the website browser used. Our customer support team would be happy to talk to the client through this process if assistance is required.

For more information about the types of cookies the Company uses please see our Cookie policy.

6. Contact Details

6.1 Data Protection Officer

Under the Processing of Personal Data (Protection of the Individual) Law of 2001, as amended and/or replaced from time to time, the client as a natural person reserves the right to obtain a copy of any personal information which we hold about him and to advise us of any perceived inaccuracy.

To proceed with such request, the client should contact our DPO (Data Protection Officer), verify his identity and specify what information is required. An administrative fee may be charged.

Contact Details of DPO

Email Address: it@fbs.eu
Telephone Number: 00357 25 313540
Postal address: 89 Vasileos Georgiou A' Str,
1st floor, Office 101,
4048 Limassol, Cyprus

7. Privacy Statement Changes

The Company reserves the right to change this privacy statement at any time deemed necessary. 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 on the Company's website. In this respect, the client hereby agrees to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's Privacy Policy, is subject to this notice and the Client Agreement. The client is advised to read this statement each and every time he accesses the site so that he is satisfied with the privacy conditions under which his personal information is provided to the Company.