

# Privacy Policy

Tradomart SV Ltd.

August 2018

Proprietary Restriction:

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## INTRODUCTION

Tradomart SV Ltd. is committed to protecting Client's privacy and handling Client's data in an open and transparent manner. The personal data that the Company collects and processes depends on the product or service requested and agreed in each case.

### **This Privacy Statement:**

- provides an overview of how the Company collects and processes the Client's personal data and tells its Clients about the Client's rights under data protection laws, rules and relevant regulations having control or jurisdiction over the Company or the Client;
- is directed to natural persons who are either current or potential clients of the Company, or are authorized representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or potential Clients;
- is directed to natural persons who had such a business relationship with the Company in the past, contains information about when the Company shares Client's personal data with other third parties (for example, the Company's service providers).

The Client's data is sometimes called "personal data" or "personal information". The Company may also sometimes collectively refer to handling, collecting, protecting and storing the Client's personal data or any such action as "processing" such personal data. For the purposes of this statement, personal data shall mean any information which identifies or may identify its Client and which includes, for example, the Client's name, address, identification number.

## **Who we are**

Tradomart SV Ltd. is a company incorporated under the Laws of Saint Vincent and the Grenadines with Registration Number 23071 IBC 2015 having its head office at Shamrock Lodge, Murray Road, Kingston St. Vincent & the Grenadines and rendering the investment and ancillary Services (hereinafter the “Company”) to its Clients through the Trading Platform. For more information please visit [www.forexmart.com](http://www.forexmart.com)

## **What personal data we process and where we collect it from**

We collect and process different types of personal data which we receive from our Clients via our website/platform, in the context of our business relationship. We also collect and process personal data from our services providers which we lawfully obtain, and we are permitted to process.

We do share Personally Identifiable Information with Third Parties solely for statistical purposes and in an effort to improve the Company’s marketing campaign and to the extent allowed by the Terms and Conditions already accepted by you.

This information includes but is not limited to **personal details such as name, address, date of birth, contact details, authentication data [e.g. signature], employment details, assets and liabilities, corporate certificates in case of a legal entity and any personal data disclosing the economic and financial background as well as other necessary financial or relevant information when applicable.**

\* From time to time we may also request further information to help us improve our services to you.

## **Investment and interest rate and currency products and services**

Specific information which we may request includes: knowledge and experience with shares, funds and interest rate/currency products, investment strategy and scope, personal investment portfolio, personal objectives.

## **Whether you have an obligation to provide us with your personal data**

In order that we may be able to proceed with a business relationship with you, you must provide your personal data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations. We are furthermore obligated to collect such personal data given the provisions of the money laundering law which require that we verify your identity when we enter into a contract or a business relationship with you or the legal entity for which you are the authorized representative / agent or beneficial owner. You must, therefore, provide us at least with your identity card/passport, your full name, place of birth (city and country), and your residential address so that we may comply with our statutory obligation as mentioned above.

Kindly note that if you do not provide us with the required data, then we may not commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

## **Why we process your personal data and on what legal basis**

As mentioned earlier we are committed to protecting your privacy and handling your data in an open and transparent manner for one or more of the following reasons:

### **A. For the performance of a contract:**

We process personal data in order to perform and offer our financial services based on contracts with our Client but also to be able to enter into a contract with prospective Clients. The purpose of processing personal data depends on the requirements for each product or service.

### **B. For compliance with a legal obligation:**

There is a number of legal obligations emanating from the relevant laws to which we are subject to. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls when applicable.

### **C. For the purposes of safeguarding legitimate interests:**

We process personal data to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

### **D. You have provided your consent:**

Provided that you have given us your specific consent for processing then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

## **Who receives your personal data**

During the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Company. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with the Company by which they are legally binded to observe confidentiality.

**Under the circumstances referred to above, recipients of personal data may be, for example:**

- Supervisory and other regulatory and public authorities, since a statutory obligation exists;
- The income tax authorities, criminal prosecution authorities when applicable;
- For our anti-money laundering process, such as credit reference agencies;
- External legal consultants;
- Auditors and accountants;
- Marketing operations;
- Fraud prevention agencies;
- Companies assisting us with the effective provision of our services to you by offering technological expertise, solutions and support and facilitating payments.

**Transfer of your personal data to a third country or to an international organisation**

Your personal data may be transferred to third countries [i.e. outside the country having control or jurisdiction over the Company or the Client]. In such cases as [e.g. to execute your payment or investment orders] or if this data transfer is required by law [e.g. reporting obligation under Tax law] or you have given us your consent to do so. Processors in third countries are obligated to comply with data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with applicable regulations.

To what extent there is automated decision-making and whether profiling takes place In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), to enter into or perform a contract with you.

**How we treat your personal data for marketing activities and whether profiling is used for such activities**

We may process your personal data to tell you about products, services and offers that may be of interest to you or your business. We study several information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects 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. You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time the Clients Support Team.

## **How long we keep your personal information**

We will keep your personal data for as long as we have a business relationship with you. Once our business relationship with you has ended, we keep your data for up to five (5) years. We may keep your data for longer than five (5) years if we cannot delete it for legal or technical reasons.

## **Your data protection rights**

You have the following rights in terms of your personal data we hold about you:

**Receive access to your personal data.** This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. A request may be sent to the [support@forexmart.com](mailto:support@forexmart.com).

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling since it is related to direct marketing. If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

**Request to receive a copy** of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name.

**Withdraw the consent that you gave us** about the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact our Clients Support Team at [support@forexmart.com](mailto:support@forexmart.com). We endeavor to address all your requests promptly.

## **Security and protection of your personal information**

The personal information that you provide in connection with registering as a user of the Site or of the Services, is classified as Registration Information. Registration Information is protected in many ways. You can access your Registration Information through a password selected by you. This password is encrypted and known only to you. Your password must not be revealed to anyone. Registration Information is safely stored on secure servers that only authorised personnel have access to via password. The Company encrypts all personal information as it is transferred to the Company and thus makes all necessary efforts to prevent unauthorised parties from viewing any such information. Personal information provided to our Company that is not Registration Information also resides on secure servers and is again accessible only to authorised personnel via password. This information cannot be

accessed online by you, therefore no password will be selected to view or modify this information.

## **Changes to this privacy statement**

We may modify or amend this privacy statement from time to time. We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

## **Legal Disclaimer**

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Website. We will not be liable for misuse or loss of personal information resulting from cookies on our website that we don't have access to or control over. We will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious, however contacted.

## **Cookies**

Our website uses small files known as cookies to make it work better in order to improve your experience. We set persistent cookies for statistical purposes. Persistent cookies also enable us to track and target the location and interests of our users and to enhance the experience of our services on our site. If you reject cookies, you may still use our site. Some of our business partners use cookies on our site. We have no access to or control over these cookies.