

A. INTRODUCTION

Trading.com cares about the privacy and confidentiality of your personal information. This Privacy Policy sets forth how Trading.com Markets Inc. and any of its respective affiliates (collectively, “**Trading.com**”) processes the information we collect about you through our website, mobile and trading applications, practice and real accounts, webinar signups, news updates (collectively, “**Services**”) and when you otherwise interact with us, such as through our various service channels. By using our Services, you agree to be bound by this Privacy Policy and our Terms of Use, as they may be amended from time to time in the future (see "Updates to This Privacy Policy" below).

The types of personal information we collect and disclose depends on the information you are required to provide to us in relation to the Services you request. Any personal information we collect, use, disclose and maintain will be governed by our most current Privacy Policy. If you are a Trading.com employee, independent contractor or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship with us or in accordance with our internal policies and procedures.

Any reference to “**us**”, “**our**”, “**we**”, or any synonym thereof in this Privacy Policy is a reference to Trading.com. Similarly, any reference to “**you**”, “**your**”, “**yours**”, “**yourself**”, or any synonym thereof in this Privacy Policy is a reference to any individual about whom we collect personal information.

B. WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT?

We may collect and disclose the following personal information when you use our Services:

- Contact information such as name, email address, mailing address, phone number;
- Unique identifiers such as username, account number, password;
- Country of Residence;
- Citizenship;
- Date of Birth/age;
- Social security number, tax identification number, driver’s license and/or state identification card number;
- IP addresses, location data, browser types, operating system, ISPs, time stamps and similar type data;
- Employer name, employment status, profession and industry;
- Bank account or debit card information;
- Copies of identification documents to verify your identity and residential address including, but not limited to your passport, social security card, utility bills, bank account statements or other proof of residential address;
- Financial information such as bank or brokerage account numbers and balances, types of investments, financial transaction history, and tax information;

- Wealth information such as your income, net worth, source of income and wealth including details about your assets and liabilities, account balances, and other information from credit reporting or another consumer reporting agencies;
- Trading activity or performance including products you trade with us, historical data about the trades and investments you made including the amount invested, and your preference for certain types of products or services including, but not limited to, your investment goals and risk tolerance;
- Correspondence, written, telephonic or electronic between you and Trading.com; and
- Any other similar information to those identified above.

We may collect your information in several ways through your use of our Services including dealings with us through our website or mobile application, new account application, practice account, application, webinar signups, subscribing to news updates and any other necessary information provided in the course of on-going customer service and compliance correspondence. We may collect information about you from third-parties or publicly available sources.

We collect and maintain information you enter during the new account application process prior to submitting your application, to enable you to complete the application at a later time, and to contact you with news, marketing, and other relevant information.

We also collect and maintain information about your transactions with us, such as your account balance, trading, and transfer activity history of your account. Use of this information allows us to properly service your account and provide you with better service.

We collect and maintain information about you from consumer reporting agencies and other organizations to verify your identity and source of funds.

We may collect and maintain information about you through use of our website, mobile applications or through your use of cookies on our website or apps. For additional information on the types of cookies we use and how they are used, please see Section G below on "What Are Cookies".

We may collect and maintain information about you through Introducing Brokers (IB). This information could include your name, address, phone number, email address, electronic signature, date of birth, driver's license number, tax ID, passport number, Social Security number, income, bank information and investment experience.

We may also record any communication that we have with you either by email, telephone, in person or otherwise, in relation to the Services we provide to you and our relationship with you. Such recordings are the property of Trading.com and constitute evidence of the communications between us. Such communications may be recorded without the use of a warning tone.

Trading.com only collects as much personal information as required in order to offer you our Services and to comply with regulatory, compliance and other legal obligations.

C. HOW DO WE USE YOUR PERSONAL INFORMATION?

We use and process the information we collect from you for purposes described in this Privacy Policy or as otherwise described to you in our Terms of Use in connection with our Services. For example, we use your information:

- **For everyday business purposes**, including, but not limited to, to allow you to register for our Services, process your transactions, handle billing and account management of your account(s), authenticate your identity (this may include third parties carrying out background and identity checks on our behalf), to fulfil our legal and regulatory obligations such as “Know Your Customer” regulatory obligations, and more. This includes sharing information with the IB that you are working with
- **To communicate with you**, such as to respond to your requests in a timely fashion, provide customer service or feedback, notify you of changes in our terms, policies, and agreements, conduct surveys, provide you updates about products and Services, or for any other purpose in connection with our Services.
- **For marketing purposes**, to offer our products and services to you.
- **To provide optimum customer service**, such as to improve the Services that we provide to you. Some of these uses include how you interact with our website, mobile application or trading platform, the duration for which you use these Services as well as monitoring the content that is of interest to you.
- **For statistical purpose, to conduct market research and product analysis and to develop and improve our products and services.**
- **To diagnose technical issues, to perform troubleshooting, and to enhance the security of our Services.**
- **For legal purposes**, such as to comply with applicable law, regulation, legal process, or governmental requests, and to respond to other legal requests, protect or exercise our legal rights to defend against legal claims, and to carry out our contractual obligations.
- **To enforce our Terms of Use**, and as otherwise set forth in this Privacy Policy.
- **For Internal Uses (including Data Analysis) and Recordkeeping.** We may need to process your personal information for internal business and research purposes as well as for recordkeeping purposes. The processing of your personal information in this way is in our legitimate business interest and is required to comply with certain legal and regulatory obligations. This may include any communications that we have with you in relation to our products and services and our relationship with you. We also maintain records to ensure that you comply with your contractual obligations to us.

We may also process usage data when you use our Services (e.g., IP address, cookies, session duration, activities undertaken on our website, mobile and trading applications, and other use data) (“**Usage Data**”) to provide, maintain, and improve such Services. In addition, the Usage Data may be used to evaluate and verify your eligibility to open an account, initiate bank transfers, maintain your account and perform our contractual obligations toward you.

In addition, we use and process data about the way our website or mobile applications are used to develop new features or new products and services (“**Analytics Data**”). Analytics Data may include information about the devices operating our website or mobile application (e.g., browser type/version, OS type/version, device type/version), or such other similar information about user configuration or operation of service features or functionality. These data are used to understand how you use and configure our website and mobile application, identify, and assess which of these configurations offer optimal performance, perform data audits, anticipate any potential issues as well as for any other operational purpose that aims to develop and improve our products and services, making such uses in our legitimate business interest.

While both Usage Data and Analytics Data may not contain information that we can use to identify you (such as a name or address), we collect this data and store it against a uniquely assigned ID.

We use automated decision making to analyse the transactions you conduct using our Services and create a profile of your usage. We use algorithms to perform this analysis. This allows us to monitor the transactions for fraudulent activity as well as review the general performance of our clients. If this raises concerns about fraudulent activity, we may take steps to close the client account and liaise with regulators as is necessary.

- **To detect and protect against error, fraud, and criminal activity.**
- **To collect information about your preferences when you use our Services to optimize your user experience.**

We always ensure that our legitimate business interests are balanced with your privacy rights in terms of what information we collect as well as why and how we process such information.

D. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

To provide you with seamless access to our Services, Trading.com may disclose your personal information in the instances described below.

- *Affiliated Third Parties.* We may disclose your personal information to any Affiliated Third Parties who provide financial and back-office services, marketing, compliance, trade processing, account management, and other services that allow us to provide our Services to you. These companies are only allowed to disclose and use your personal information in the same way that we may disclose and use your personal information pursuant to this Privacy Policy.
- *Non-Affiliated Third Parties.* We may disclose personal information to non-affiliated third parties that assist us in facilitating all of the transactions that occur within your account or provide other services such as identification verification and background checks, bank account and debit card verification. We may also share information with non-affiliated third parties that include both financial service providers and non-financial companies. We may also disclose the personal information we collect to other non-affiliated third parties for our everyday business purposes, such as to maintain account(s), respond to court orders and legal investigations, comply with

regulatory obligations, report to credit bureaus, offer our own products and services, help us analyse and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us, protect against fraudulent activities, perform services on our behalf, and as otherwise required or permitted by law.

- Types of Non-Affiliated Third Parties.

As mentioned above, there are different types of non-affiliated third parties with whom we may share your personal information. The types of such non-affiliated third parties include without limitation:

Our service providers that perform services on our behalf. Such services may include companies who perform background checks or identity verification, process your transactions, maintain your accounts, data analysis, regulatory, compliance, business intelligence, customer relationship platform providers, marketing support services providers, cloud service providers, IT service providers or other service providers;

Our strategic partners to permit them to assess your interest in our products and services including foreign exchange payments and international money transfers;

Our attorneys, accountants, and auditors in the ordinary course of our business;

Persons holding a legal or beneficial interest relating to your account;

Anyone that you authorize to access your account(s);

Persons acting in a fiduciary, representative, or attorney capacity in relation to your account;

Credit providers, courts, tribunals, governmental, regulatory or law enforcement agencies as agreed or to the extent permitted or required by any law or regulation, or in accordance with our agreement(s) with you;

As a result of a proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Trading.com's business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We require that any third-party that handles or obtains personal information enter into a contractual agreement requiring it to maintain the confidentiality of such information, prohibiting it from using or disclosing your personal information, except for the limited purpose for which it is provided to them and only to the persons for whom disclosure was intended or otherwise permitted by law, and to comply with all relevant data protection laws and this Privacy Policy. Third party service providers such as identity verification

agencies may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

- *Legal Purposes.* We disclose personal data to respond to subpoenas, court orders, legal process, law-enforcement requests, legal claims, or government inquiries and to protect and defend the rights, interests, safety, and security of Trading.com, our affiliates, users, or the public.
- *To third parties as we reasonably consider necessary in order to prevent crime, e.g., the police.*
- *Substantial corporate transactions.* We may share personal data in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, reorganization, financing, change or control or acquisition of all or a portion of our business by another company or third party, asset sale, initial public offering, or in the unlikely event of bankruptcy or similar proceeding.
- *Joint Account Holders.* You should only give us personal information about someone else (such as a joint applicant) with their permission. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy policy. Sometimes, when you open a joint account or product, this may mean that your personal information will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder and vice versa.
- *With Your Consent.* We may share your personal information for any other purposes disclosed to you with your consent.

E. HOW DOES TRADING.COM PROTECT AND STORE YOUR PERSONAL INFORMATION?

All information you provide to us is stored on our secure servers. We have implemented procedures to safeguard your personal information. We restrict access to personal information to those Trading.com employees or agents who need to know that information to provide our Services to you. We maintain physical, electronic, and procedural safeguards to protect your personal information. We protect your personal information by keeping it on the secure portions of our website, using firewalls and other security technology, tools, and procedures to protect our network and systems from external attacks, and by requiring you to enter a unique user ID and password to access your account(s).

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website, mobile and trading applications, you are solely responsible for keeping this password confidential. We ask you not to share your log-in credentials (i.e., User ID and password) with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of

your data transmitted to us. Any transmission of your personal information is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access. Also, please note the privacy protection provided to you on our website does not extend to any other website. Once you link to another site, you are subject to the policies of that website.

F. HOW LONG DOES TRADING.COM RETAIN MY INFORMATION?

We retain your personal information for as long as we are providing our Services to you. We retain personal information after we cease providing Services directly or indirectly to you, even if you close your Trading.com account or complete a transaction with us, to the extent necessary to comply with our legal and regulatory obligations, and for purposes of fraud monitoring, detection, and prevention. We also retain personal information to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the information by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain information, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

G. WHAT ARE COOKIES?

We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "Cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files placed in website visitors' computer browsers to store their preferences. Both Trading.com in providing its Services and our third-party partners, collect and store information that is generated automatically as you use it, including your preferences and anonymous usage statistics. Please see Trading.com's [Cookies Policy](#) for more information. To opt out, please visit www.aboutcookies.org.

H. LINKS TO NON-TRADING.COM WEBSITES

The Trading.com website may provide links to third-party websites for client convenience and information. If clients decide to access those links, they will leave the Trading.com's website. Trading.com does not control those third-party sites or their privacy practices, which may differ from Trading.com's practices. Trading.com does not endorse or make any representations about third-party websites. This Privacy Policy will not cover any personal information that you choose to give to unrelated third-party websites. You should review the privacy policy of any third-party website before submitting personal information. Some third-party companies may choose to share their personal information with Trading.com. That sharing is governed by the disclosing company's privacy policy.

I. AM I ABLE TO OPT OUT OF TRADING.COM SHARING MY PERSONAL INFORMATION?

You can stop receiving promotional emails from us by clicking on the "unsubscribe" link contained in any direct marketing emails you receive from us. You may not opt out of service-

related or other non-promotional communications (e.g., account verification, transactional communications, changes/updates to features of the Services, and technical and security notices) if you want to continue receiving Services from us.

J. NOTIFICATION OF CHANGES TO PRIVACY POLICY.

Trading.com provides an initial notice of its Privacy Policy to customers electronically at the time the customer establishes a customer relationship, and at least annually thereafter, and the Privacy Policy is dated and posted on its website for review by customers and non-customers. This Privacy Policy is reviewed and updated, as necessary, to comply with new laws, adapt to new technologies and changes in our operations to better serve you and your experience with us. In case of any such changes, we will post the updated Privacy Policy on our website. The changes will take effect as soon as they are posted on our website.

K. STATE CONSIDERATIONS:

You may have other protections under applicable state laws, such as those in Vermont, Nevada and California. To the extent these state laws apply, we will comply with them if we share your personal information.

L. HOW CAN I CONTACT YOU WITH A QUESTION OR COMPLAINT?

If you have any questions, comments, or concerns regarding this Privacy Policy, please feel free to contact us at privacy.us@trading.com.

M. PRIVACY POLICY UPDATES AND CONTACT:

Trading.com may update this Privacy Policy from time to time. In the event we materially change this Privacy Policy including how we collect, process, or use personal information, Introducing Brokers will be notified by email, phone and/or via Services. Potential Introducing Brokers and other relevant subjects are notified by means of the publication of the updated Privacy Policy on the website.

We encourage you to periodically review this Privacy Policy so that you are always aware of what information the Administrator collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Privacy Policy.

Should you have any further questions in relation to the processing of your personal data, we invite you to contact us at privacy.us@trading.com.

This Privacy Notice was last updated on 30 May 2023.