

## **PRIVACY POLICY**

This Privacy Policy covers the website <https://www.instatrade.com/>.

### **THE POLICY**

The purpose of this policy is to explain how the Company when, why and how we process information which may relate to you (“**personal data**“). It also provides important information on your statutory rights. This Policy is not intended to override the terms of any contract you have with us, nor rights you might have under data protection laws.

In this Policy, your data is sometimes called “**personal data**” or “**personal information**”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing” such personal data.

For the purposes of this Policy, personal data shall mean any information relating to you which identifies or may identify you and includes, for example, your name, address, identification number.

### **APPLICATION**

In order to open an account with InstaTrade you must first accept the terms of the Agreement for conducting Trading Operation. Then, you must fill-up the Registration Form that requires the personal details of the account owner and the type of account that you are opening with the company. By completing the application form you are requested to give private information in order to enable the Company to evaluate your application and comply with the Laws and Regulations governing the provision of financial services. This information is also used to contact you about the Company's services.

### **PERSONALLY IDENTIFIABLE INFORMATION**

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, employment details, assets and liabilities and other necessary financial information. From time to time we may also request further information to help us improve our services to you.

### **AGENTS**

We use a card-processing company for deposits and withdrawals to and from your account. This company will retain, share, store or use personally identifiable information for the purposes related to payment processing the deposit and withdrawals to your account.

The card processing company will retain such personal identifiable information for as long as reasonably necessary for the above mentioned purposes.

The company shall transfer such personal identifiable information to the card processing company in order to process the deposits and withdrawals from your account. You hereby consent to such transfer of personal identifiable information in order to process the deposits and withdrawals of funds to your account with the company.

## **PRIVACY**

Any personal information you provide will be treated as confidential and shared only within the Company, its affiliates and its business partners and will not be disclosed to any third party except under any regulatory or legal proceedings or to third parties that solely provide statistical services to the Company to improve its marketing campaign, or to any party that is deemed appropriate, under the Company's sound discretion. Website tracking systems may also collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits and so on. The information we obtain is used to improve the content of our website and may be used by us to contact you, by any appropriate means, and to provide you with any information we believe may be useful to you.

## **CREDIT REPORTING**

Personal information may also be disclosed to credit-reporting or reference agencies, or to anyone authorized by an individual, as specified by that individual or the contract.

## **CHOICE/OPT-OUT**

If you no longer wish to receive any promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

The Company shall exert efforts to ensure you will be notified when your personal information is collected by any third party that is not our agent/service provider, so you can make an informed choice as to whether or not to have that information shared with that party.

## **COOKIES**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We do link the information we store in cookies to any personally identifiable information you submit while on our site.

We use both **session ID cookies** and **persistent cookies**. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions usually provided in your Internet browser's "help" file.

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, subject to our discretion, still use our site.

We fully respect your privacy and provide you the relevant information and tools on how you can manage your cookie preferences.

## **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 authorized personnel have access to via password. The Company does its best to encrypt all personal information as it is transferred to the Company and thus, makes all necessary efforts to prevent unauthorized parties from viewing any of such information.

In regards with personal information provided that is not Registration Information, the Company exerts necessary efforts to ensure that such personal information provided, also resides on secure servers and is again accessible only to authorized personnel via password. This information cannot be accessed online by you; therefore, no password will be selected to view or modify this information.

## **ACCESS TO PERSONALLY IDENTIFIABLE INFORMATION**

If your personally identifiable information changes, you must change it in the secure area of the website or inform us by emailing our Customer Support at [support@instatrade.com](mailto:support@instatrade.com) or by contacting us using the information provided on the Company's website.

## **Processing and Collection of Personal Data**

We collect and process different types of personal data which we receive from our customers 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 are permitted to process.

If you are a prospective customer, or a non-customer counterparty in a transaction of a customer (e.g., account or payment authorization (by SWIFT or not) and over-the-counter transactions) or prospective security provider (e.g., a guarantor for a credit facility) or an authorised representative/agent or beneficial owner of a legal entity or of a natural person which/who is a prospective customer, the relevant personal data which we collect may include:

Name, address, contact details (telephone, email), identification data, basic payment account identification, birth date, place of birth (city and country), marital status, employed/self-employed, if you hold/held a prominent public function (for PEPs), FATCA / CRS info, authentication data [e.g., signature].

When we agree to provide products and services to you or the legal entity you represent or beneficially own, then additional personal data will be collected and processed which may include, in the context of providing banking facilities:

Current income, employment history, property ownership, personal investments and investment income, tax residence and tax ID, residence or work permit, employment position [e.g., as per corporate certificates of directors/shareholders].

For individuals, the Company will request personal data disclosing their economic and financial background.

### **Investment and Interest Rate, Currency Products and Services**

Specific information which we may request includes: knowledge and experience with shares, funds and interest rate/currency products (e.g., for MiFID services), investment strategy and scope, personal investment portfolio, personal objectives.

### **Personal Data Obligations**

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, as required by the provisions of the money laundering law which duly obligates us to verify your identity before 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 basic identity information and/or basic forms of identity information, such as, but not limited to: identity card/passport, your full name, place of birth (city and country), and your residential address, in order to comply with legal obligation/s as mentioned above.

Kindly note that if you do not provide us with the required data, we will not allow the commencement or continuation of the business relationship either to you as an individual, or as the authorized representative/agent or beneficial owner of a legal entity.

### **Receivers of 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 observe confidentiality and data protection according to the applicable data protection law.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent, or for any other reason the Company deems appropriate and necessary. All data processors appointed by us to process personal data on our behalf are bound by contract and by law to comply with the applicable data protection law.

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.
- For our anti-money laundering process, such as credit reference agencies,
- External legal consultants,
- Auditors and accountants,
- Marketing operations,
- Fraud prevention agencies,
- Companies who assist us with the effective provision of our services to you by offering technological expertise, solutions and support and facilitating payments.

For example, we use Google and Yandex software products to generate analytical data and receive advertising services.

### **Transfer of Personal Data to a Third Country or an International Organization**

Your personal data may be transferred to third countries, 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 when you have given us your consent to do so. Processors in third countries are obligated to comply with the local data protection standards of their country and to provide appropriate safeguards in relation to the transfer of your data.

### **Extent of Automated Decision-Making, and the use of Profiling**

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.

### **Treatment of Personal Data for Marketing Purposes, and the use of Profiling**

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 pieces of 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 aim to only use your personal data to promote our products and services to you when we have your explicit consent to do so, or, in certain cases, when 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 Company's Support Team.

### **Period for Keeping of Personal Information**

We aim to keep your personal data for as long as we have a business relationship with you.

Once our business relationship with you has ended, we shall keep your data for up to five (5) years in accordance with the directive of the regulator of the company.

We may keep your data for a longer period for as long as it is required in order to fulfill the relevant purposes described in this Privacy Policy, and as may be required by law such as for tax and accounting purposes, compliance with Anti-Money Laundering laws, or as otherwise communicated to you.

### **Data Protection Rights**

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

**a.Receive access to your personal data** - This enables you to e.g., receive a copy of your personal data and to check that we are lawfully processing it. A request may be sent to the support@instatrade.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, we shall stop the processing of your personal data for such purposes. However, the Company shall not be liable if, for any reason, it has failed to stop the processing of your personal data for such marketing purposes.

**b.Request to receive a copy** - Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and to transmit such data to other organizations. You also have the right to have your personal data transmitted directly by ourselves to other organizations you will name. However, the Company shall not be liable when, for any reason, it has failed to honor any of the rights mentioned above.

**c.Withdraw the consent that you gave** - Withdraw the consent that you gave in relation to the processing of your personal data, at any time. Note that any withdrawal of consent shall not affect the lawfulness of any consensual processing prior to any such withdrawal or revocation.

To exercise any of your rights, or, if you have any other questions about our use of your personal data, please contact our Customer Support Team at [support@instatrade.com](mailto:support@instatrade.com).

We endeavor to address all your requests promptly.

However, the Company shall not be liable, if , for any reason, it has failed to honor the right/s mentioned above.

**d.Right to Lodge Complaint** - If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by completing our Complaint Form, which you may find in our website at <https://www.instatrade.com/>.

## **LEGAL DISCLAIMER**

We reserve the right to disclose your personally identifiable information as may be 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, or for any other reason deemed necessary by the Company under its sound discretion. We will not be liable for misuse or loss of personal information resulting from cookies on our website that we do or do not have access to. We will not be liable for misuse or loss of personal information resulting from cookies on our website that we do or do not have control over. We will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, either negligently, maliciously or by accident.

## **CHANGES IN THIS POLICY**

If we decide to change our Privacy Policy, we will post those changes through this page, or other places we deem appropriate so that you are aware of the information we collect, how we use it, and under what circumstances we partially or wholly disclose it.

We reserve the right to modify this Policy at any time. We strongly urge you to review it frequently. If we make material changes to this Policy, we will notify you here, by email, or by means of a notice on our homepage, or by any other means the Company deems appropriate.