



PRIVACY POLICY

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VT Markets LLC

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1. Introduction

VT Markets LLC (referred to as VT Markets, we, our, us) is bound by the **Data Protection Act 2017 ('DPA2017')**, including the General Data Protection Regulation ("**GDPR**"). We recognise the importance of ensuring the confidentiality and security of your personal data.

This Privacy Policy (the "Policy") explains how we collect, process, and protect your personal data when you use our services. All third parties, including clients, suppliers, subcontractors, and agents, who have access to personal data collected by VT Markets, must adhere to this Privacy Policy. This Policy is available free of charge and can be downloaded from our website.

2. What personal data do we collect and hold?

We only collect and process personal data that is necessary for the purposes outlined in this policy, in line with the principle of data minimisation under GDPR, including:

- name;
- address;
- phone number
- date of birth;
- postal or email address; or
- phone numbers, including home, mobile and work;
- information relating to an individual's income and source of wealth;
- occupation;
- credit/debit card details;
- bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;
- information relating to your trading experience;
- identification documentation, as required under the Financial Intelligence and Anti-Money Laundering Act 2002 (FIAMLA), including:
 - passport;
 - driver's licence;
 - national identity card;
 - utility bills;

- any other information that is relevant to the services that we provide.

3. How do we use your personal data?

We use personal data for the following purposes:

- **Registration and user account**

In order to use the services, you must register on the website and create your account, and for this purpose we process your personal data.

- Personal data: identification and contact data; we may also process your data related to the settings of your user account.

- Legal ground for the processing: Processing is necessary for the performance of the contract, and the provision of these personal data is required, as we cannot register your user account without them.

- **Provision of services and exercise of rights and obligations under the contract between us and the customer**

In order to be able to provide you with our services, i.e. in particular to provide you with the relevant access, tools and support, and to carry out trades, we need to process your personal data. For this purpose, the following shall apply:

- Personal data: Identification and contact data and, in the case of paid services, also payment data, data on the use of the services, data on the simulated trades and, if you decide to link your social networks accounts with the account on the website, also data from social networks.

- Legal ground for the processing: Processing is necessary for the performance of the contract on the basis of which we provide our services, or on the basis of our legitimate interest. After we stop providing you with services, we process personal data for a limited period of time. Such processing is necessary for the purposes of exercising and protecting our rights based on our legitimate interests.

- **Marketing communication about our services and products or about events in which we take part**

If you are our current or past customer, we may from time to time send you marketing communications that relate to our services. We may also send you commercial communications to the extent to which you give us your consent. Each of the e-mails sent will be marked as a business communication and each of them will contain a link with the help of which you can easily unsubscribe from the business communications. For this purpose, the following shall apply:

- Personal data: Identification and contact data;
- Legal ground for the processing: If we have provided you with our services, we may from time to time send you marketing communications based on our legitimate interest,

namely keeping in touch with our customers. If you give us your consent to process your data for marketing purposes, then we process your data on the basis thereof.

You have the right to withdraw your consent for receiving marketing communications from us at any time by clicking the unsubscribe link in our emails.

- **Customer support and communication**

If you use our customer support services, we will process your personal data. For this purpose, the following shall apply:

- **Personal data:** Identification data, contact data, other data and data from social networks, if you contact us through social networks.
- **Legal ground for the processing:** Processing is based on our legitimate interest, namely in maintaining customer satisfaction and supporting the use of our services.

- **Improving services**

If you use some of our services, we will process your personal data in order to develop, test and enhance the services and improve their security. For this purpose, the following shall apply:

- **Personal data:** Identification and contact data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.
- **Legal ground for the processing:** Processing is based on our legitimate interest, namely in improving our services.

- **Analytics**

To obtain information about how our website and our services are used, we analyse customer behaviour. For this purpose, the following shall apply:

- **Personal data:** Identification data, contact data, payment data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.
- **Legal ground for the processing:** Processing is based on our legitimate interest, namely in ascertaining customer behaviour and estimating customer preferences.

We may use automated decision-making, including profiling, in providing certain services, such as assessing your trading preferences. You have the right to request human intervention if you disagree with the outcome of automated decision-making processes.

4. How do we store personal data and how are they secured?

We are committed to securing your personal data and take steps to protect it from misuse, interference, loss, and unauthorised access, modification, or disclosure. Personal data is stored in our secure database, and paper files are kept in secure areas. Security measures include:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- we change employees' access capabilities when they are assigned to a new position;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal data;
- all computers which contain personal data are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal data is limited.

5. How long do we process your data?

We process your data only for as long as necessary to fulfill the purposes outlined in this policy or as required by law. After this period, the data will be either deleted or anonymised. The processing periods include:

- **Performance of the contract and exercise of rights/obligations:** Personal data are processed for the necessary period of time, typically up to 10 years following the termination of the last contract, as required by legal retention obligations in Mauritius.
- **Business communications:** Personal data are processed for a maximum of 5 years from the expiry of the last contract between us or until you raise an objection or unsubscribe from business communications.
- **Enhancing our services:** Personal data are usually processed for a maximum period of 6 months.
- **Legal obligations:** Personal data are processed for the period set out by relevant legal regulations, generally 7 years for financial records, but up to 10 years for tax and AML/CFT records.
- **Consent-based processing:** If you have given your consent, personal data will be processed for the period specified in the consent.

6. Data sharing and transfers to third countries

We may share your personal data with the following third parties to help provide our services:

- Trading platform providers
- Other companies within our group

- Hosting and cloud service providers
- Payment system operators and financial institutions
- Customer support tools and services providers
- IT companies, marketing agencies, consultants, and postal service providers.

We ensure that any third parties processing personal data on our behalf comply with contractual obligations to protect your data. In certain instances, personal data may be transferred to controllers for their own purposes, and their processing rules will apply.

When transferring personal data to third countries outside the EEA, we ensure that appropriate safeguards are in place, such as the use of Standard Contractual Clauses (SCCs) or other legal mechanisms, to protect your data.

7. Your rights

- **Right of Access:** You can request confirmation of data processing and a copy of the data processed.
- **Right to Rectification:** You can notify us to correct any inaccurate personal data.
- **Right to Erasure ("Right to be Forgotten"):** You may request the deletion of your personal data under specific circumstances.
- **Right to Restriction of Processing:** You can request a restriction on data processing under certain conditions.
- **Right to Data Portability:** You have the right to request that we provide your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another data controller, where technically feasible..
- **Right to Object:** You may object to data processing based on legitimate interests, including for marketing purposes.
- **Right to Withdraw Consent:** If processing is based on your consent, you may withdraw it at any time.
- **Right to Lodge a Complaint:** If you believe your data is being processed unlawfully, you can lodge a complaint with the relevant supervisory authority.

Data Breach Notification

In the event of a personal data breach, we will notify you and the relevant supervisory authority without undue delay, and within 72 hours, if the breach is likely to result in a high risk to your rights and freedoms.

8. Record-Keeping Requirements

We maintain detailed records of our data processing activities to comply with legal requirements and ensure transparency in our operations.

9. Final provisions

This policy will be periodically reviewed to reflect updates in laws, technological advancements, and changes in our operations and business environment..