

Privacy Policy

1. This Privacy Notice Policy (hereinafter referred to as the “Privacy Notice”) is issued pursuant to and reflects compliance with the requirements and/or obligations and/or duties introduced by the EU General Data Protection Regulation 2016/679 (hereinafter referred to as the “GDPR”), as amended and replaced from time to time, the e-privacy Directive 2002/58/EC as amended and replaced by the Directive 2009/136/EC, as amended and replaced from time to time, their implementing legislations and the Cyprus Law on Data Protection, as amended and replaced from time to time (hereinafter collectively referred to as the “Data Protection Laws”), in regards with any and all Personal Data or Information (hereinafter referred to as the “Personal Data” or “Data”) processing activities carried out by the Company.

2. Scope and Objective of the Privacy Notice

2.1 The Company respects individuals’ rights to privacy and the protection of Personal Data. The scope of this Privacy Notice is to explain and elaborate on how we collect, use, process and store Personal Data in the course of our business.

2.2 “Personal Data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.3 The Company may update the Privacy Notice from time to time. When we make any updates, we will communicate such updates to you.

3. The Personal Data we process

3.1 We collect, use and process various categories of Personal Data at the start of, and for the duration of, your business relationship with us. The Company will limit the collection and processing of Personal Data to the necessary Data to meet the purpose and legal basis as described in the Section 5 of this Privacy Notice.

3.2 Personal Data may inter alia, include:

a. Basic Personal Data, including but not limited to name, residential address, date of birth, email address, telephone number, citizenship, marital status, family and next of kin information and contact details of such persons;

b. Visual images including but not limited to copies of passports, identity cards and driver’s license;

c. Online profile and social media information and activity based on your interaction with us, our websites and applications including but not limited to login information, Internet Protocol (IP) address, smart device information, location coordinates, mobile phone network information, searches and site visits;

d. Bank account details including but not limited to IBAN number, SWIFT code, account number and Sort Code (where applicable).

3.3 The Company may also process certain special categories of Personal Data for specific and limited purposes and only on the basis of an explicit consent granted by you or on any other legal basis, as described in the Section 5 of this Privacy Notice.

3.4 When you open an account with us, a unique account number will be issued as well as a User ID and password. Only certain employees of the Company shall have access to your account number and User ID. However, please note that you are fully responsible for the secrecy of your account number, User ID and password. As a result, if you disclose your account number, User ID and/or password by any means, to any person, you shall be considered as fully responsible for such action.

3.5 Subject to the Law, the Company may process Personal Data about criminal convictions or offences and/or alleged offences for specific and limited activities and purposes including but not limited to perform checks to prevent and detect crime and comply with the Law relating to Anti-money laundering and terrorist financing, fraud, bribery, corruption and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing Data between credit or financial organisations, CySEC or other Competent or other authorities including non-governmental authorities in any jurisdiction within or outside the European Economic Area (hereinafter referred to as the “EEA”).

4. How Personal Data is collected

4.1 Your Personal Data is collected:

- a.** From you;
- b.** From third parties – including subsidiaries or sister companies of the Company, third parties who provide services to you within and/or outside the EEA;
- c.** Credit reference and fraud prevention agencies, banks or other financial institutions, third authentication service providers and the providers of public registers;
- d.** During our business relationship with you and the way you operate your account/s;
- e.** From the technology that you use to access our services including location data from your mobile phone, or an IP address or telephone number and how you use it;
- f.** From publicly available sources including the press, company registers and online search engines whatsoever.

4.2 It is your duty and responsibility to provide us with updates as to the Personal Data provided in order for such Data to remain current, accurate and correct and you acknowledge that we rely on the Personal Data provided to us in carrying out our obligations, under the law and our business relationship with you.

4.3 Where you are a non-physical person providing to us Personal Data of any other individual or where you are an individual providing us with Personal Data of any individual other than yourself, you hereby undertake and represent that such individual, whose Personal Data is collected, used, processed and stored in accordance with this Privacy Notice, has been fully informed of and clearly consented in writing to such collection, use, processing and store of his/her Personal Data under this Privacy Notice and that he/she has been informed of his/her rights in relation to the Personal Data which is collected, used, processed and stored, under this Privacy Notice.

4.4. Please note that if you don't agree to provide us with the Data outlined above we may have to suspend the operation of your account and/or the services.

5. Your rights

5.1 The Company takes all the appropriate measures to make sure that you are fully informed about your rights in regards with all Personal Data we collect, process, use and store.

5.2 As a result, all rights and the circumstances under which such rights may be exercised are described in the table below. In the event you wish to exercise any of the rights or if you have any queries about how we collect, use, process or store your Personal Data that are not answered in this Privacy Notice, please contact us at dpo@tradecapitalmarkets.com.

5.3 Please note that in some cases, if you do not agree to the way we collect, use, process or store your Personal Data, it may not be possible for us to continue our Business Relationship.

6. Cookie Policy

Cookies are small packages that a website stores on your computer or any other electronic device when you visit a website to enable you to perform numerous functions on the website as well as to regulate the content to your preferences. As a result, the Company uses cookies to ensure that the performance and the functionality of its website is robust and enhanced.