

# Privacy Policy for the CoreTradeGlobal Platform

## 1. Introduction and Scope

CoreTradeGlobal (“we”, “our”, or “the Platform”) values your privacy and is committed to protecting your personal data in compliance with international privacy regulations, including:

- The UK Data Protection Act 2018 and UK GDPR,
- The EU General Data Protection Regulation (GDPR),
- The California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA),
- Other applicable U.S. state privacy laws (Virginia CDPA, Colorado CPA, Connecticut DPA).

This Privacy Policy explains how we collect, use, share, and protect your personal data. It applies to all individuals (“users”, “you”) who access or use the Platform — whether as a visitor, registered buyer, seller, or business partner.

## 2. Data Responsibility

For users located in the UK or EEA, CoreTradeGlobal acts as the Data Controller under UK GDPR / EU GDPR.

For users in the United States, CoreTradeGlobal acts as a “business” as defined by CCPA/CPRA.

### Contact Details:

**UK Representative:** Kuruculardan birinin ismi, title’ı, adresi (şehir/ülke) ve emaili.

**EU Representative (Article 27 GDPR):** Kuruculardan birinin ismi, title’ı, adresi ve emaili.

**U.S. Privacy Contact:** info@coretradeglobal.com

## 3. Information We Collect

We collect personal data necessary to operate, secure, and improve the Platform.

### (a) Information You Provide Directly

- Name, company name, address, email, and phone number

- Account credentials (username, password)
- Tax or business registration information (for sellers)
- Communications via chat, support, or dispute resolution

**(b) Automatically Collected Information**

- Device identifiers (IP address, browser type, OS version, approximate location)
- Usage logs, pages visited, and session time
- Cookies and analytics tags (see Section 5)

**(c) Information from Third Parties**

- Identity verification and KYC providers
- Payment processors and logistics partners
- Analytics, advertising, or fraud-prevention partners

**4. Purpose and Legal Basis for Processing**

We process your personal data for defined and lawful purposes based on the following legal bases under UK/EU GDPR and U.S. privacy law:

<b>Purpose of Processing</b>	<b>Legal Basis (GDPR/UK GDPR)</b>	<b>CCPA/CPRA Category</b>
Account registration and management	Art. 6(1)(b) – Contract	“Providing services”
Fraud prevention and platform security	Art. 6(1)(f) – Legitimate interest	“Detecting security incidents”
Customer support and communication	Art. 6(1)(b)/(f)	“Customer service”
Marketing and promotional communications	Art. 6(1)(a) – Consent	“Advertising and marketing”

Analytics and service improvement	Art. 6(1)(f)	“Analytics and research”
Legal and tax compliance	Art. 6(1)(c) – Legal obligation	“Compliance with law”

You may withdraw consent at any time where processing relies on consent.

## 5. Cookies and Tracking Technologies

We use cookies, pixels, and similar technologies to enhance functionality and analyze performance.

You can manage your preferences via our Cookie Consent Banner or browser settings.

Cookies are grouped as follows:

- Strictly Necessary
- Functional
- Performance / Analytics
- Advertising / Targeting

For U.S. users, cookies that constitute a “sale” or “share” under CCPA can be opted out via our [“Do Not Sell or Share My Personal Information” link](#).

## 6. Data Sharing and Disclosure

We do not sell personal information for monetary gain.

However, we may share data as necessary for legitimate business operations with:

- Service providers (hosting, analytics, payment, communication)
- Affiliates and subsidiaries
- Legal or regulatory authorities where required
- Other users (e.g., buyer-seller communication)

All processors are bound by Data Processing Agreements (DPAs) ensuring confidentiality and compliance with GDPR/UK GDPR.

## 7. Cross-Border Data Transfers

If personal data is transferred outside your jurisdiction (including to the U.S.), we ensure appropriate safeguards as required by GDPR and UK GDPR:

- Standard Contractual Clauses (SCCs) or UK International Data Transfer Agreements (IDTAs)
- Transfer Impact Assessments (TIAs)
- Encryption and pseudonymization where feasible

We comply with all data transfer requirements under UK ICO and EU supervisory authorities.

## 8. Data Retention

We retain data only as long as necessary for the purposes outlined in this Policy or to meet legal obligations.

<b>Data Category</b>	<b>Retention Period</b>
Account information	Until account deletion + 12 months
Transaction records	5 years (tax/audit purposes)
Communication logs	2 years
Marketing preferences	Until consent withdrawal

After expiry, personal data is securely deleted or anonymized.

## 9. Data Security

We apply technical and organizational security measures aligned with GDPR Article 32 and UK GDPR standards, including:

- Data encryption (in transit and at rest)
- Firewalls and intrusion detection systems
- Access control and regular security audits
- Employee confidentiality and data-protection training

## **10. Your Rights Under UK and EU GDPR**

If you are located in the UK or EU/EEA, you have the following rights:

- Access your data (Art. 15)
- Rectify or erase data (Arts. 16–17)
- Restrict or object to processing (Arts. 18 & 21)
- Data portability (Art. 20)
- Withdraw consent at any time

We will respond to verified requests within 30 days, extendable by 60 days for complex cases.

## **11. Your Rights Under U.S. Privacy Laws (CCPA/CPRA)**

U.S. residents, particularly those in California, have the following rights:

- Right to Know – what categories of data we collect, use, or disclose
- Right to Delete – request deletion subject to legal exceptions
- Right to Correct – inaccurate information
- Right to Opt-Out – of sale or sharing
- Right to Limit Use – of sensitive personal data
- Right to Non-Discrimination – no different pricing or service levels for exercising rights

To exercise these rights, contact [info@coretradeglobal.com](mailto:info@coretradeglobal.com) or use the “Do Not Sell or Share My Personal Information” link on our website.

---

## **12. Data Breach Notification**

In the event of a personal data breach likely to result in risk to your rights or freedoms, we will:

- Notify the ICO (UK) and/or EU supervisory authorities within 72 hours;
- Notify affected users without undue delay;
- Follow applicable U.S. state-level notification requirements.

### **13. Children's Privacy**

Our Platform is not directed at or intended for children under 16 years of age.

We do not knowingly collect data from minors. If you believe a child has provided personal information, please contact us immediately for removal.

### **14. Updates to This Policy**

We may update this Privacy Policy from time to time to reflect changes in law, technology, or our practices.

Significant updates will be communicated via email or platform notice.

Continued use of the Platform after an update constitutes acceptance.

### **15. Contact Information**

**UK Privacy Contact:**

**EU Representative:**

**U.S. Privacy Contact:** [privacy@coretradeglobal.com](mailto:privacy@coretradeglobal.com)

### **16. Effective Date**

This Policy was last updated on October 18th, 2025 and supersedes all prior versions.

By using the Platform, you acknowledge that you have read and understood this Privacy Policy.