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Tradingclub.fund Privacy Policy

Commitment

This Privacy and Security Policy explains how Tradingclub collects personal data about you and how it maintains, uses and discloses that data.

Tradingclub is committed to protecting the privacy of all personal information which is obtained from you, including the information we obtain during your visits to this website. Tradingclub will only use your personal information in accordance with this Privacy and Security Policy.

What information do we collect from you?

Tradingclub will collect and store personal information about you, as is legally required in order for Tradingclub to provide you with the investment services. This includes, among others, your date of birth, your address and a photocopy of your national ID card, passport, or other form of ID and a copy of a recent utility bill or other proof of address. We may obtain personal information as a result of authentication or identity checks, including checks with credit reference agencies (who may keep a record of the information) to prevent fraud.

Tradingclub also collects and processes personal information about you that is necessary for us to provide you with our services. This includes information about you when you complete an online application or another type of form and when you access and trade through your Tradingclub account.

Tradingclub may also derive information from your use of this website, trading platform and app and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, computer identification parameters, types of transactions conducted, documents downloaded, mouse clicks, mouse movements, scrolling activity as well as text you type in this website and which website referred you to ours or to which websites you link.

How we use and share your personally identifiable information?

Tradingclub will use your personally identifiable information and share it with partners, contractors, service providers, transaction processors, advisors and affiliates of Tradingclub (including but not limited to parent, sister and subsidiary companies in the Tradingclub Group) (the "Partners"), for the following purposes only or subject to your explicit consent:

- To provide the services to you that you have requested including processing transactions.
- To confirm your identity.
- To maintain your personal profile.
- To manage your account.
- To contact you when necessary or appropriate in relation to the services being provided to you.
- To keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of Tradingclub.
- To manage and administer the products and services provided to you.
- For marketing purposes, including, but not limited to providing you with information regarding the products and services offered by Tradingclub or its Partners.
- For marketing purposes, including, but not limited to providing you with information regarding the products and services offered by Tradingclub or its Partners.
- In developing an understanding of the products and services that you may be interested in obtaining from Tradingclub or its partners.
- To provide you with information or opportunities that we believe may be relevant to you.
- To tailor the website to your needs and interests.
- To create impersonalized statistical data.
- To enforce the governing terms and conditions.
- if Tradingclub believes that you have breached the governing terms and conditions, or abused your rights to use the services, or performed any act or omission that Tradingclub believes to be violating any applicable law, rules, or regulations, then Tradingclub may share your information with law enforcement agencies and other competent authorities as well as with other

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third parties, as may be required.

• If Tradingclub is required, or believes that it is required by law to share or disclose your information to governmental authorities or to any other third party.

- In any case of dispute, or legal proceeding of any kind between you and Tradingclub, or between you and other clients or third parties with respect to, or in relation with the services Tradingclub provides.
- To conduct surveys and questionnaires.
- In any case where Tradingclub believes that sharing information is necessary to prevent imminent physical harm or damage to property.
- If Tradingclub organizes the operation of its services within a different framework, or through another legal structure or entity, or if Tradingclub is acquired by, or merged with another entity, provided however, that those entities agree to be bound by the provisions of this policy, with respective changes taken into consideration.

Technical Information we collect about you

We automatically collect certain information from you when you use the Platform including when you are using the App without an account. Such information includes your IP address, browsing history (i.e. the content you have viewed on the Platform), model of your device, the device system, network type, and operating system.

Statistical Data

Tradingclub may combine your personally identifiable information with information from other users of this website to create impersonalized statistical data for the purposes of monitoring and improving service. Tradingclub may provide this statistical data to third parties. Under no circumstances will you be able to be identified from this statistical data; you will remain anonymous.

Choice and opt-out

In the registration process with Tradingclub as a client, you will be given the option to opt-out of subscribing to:

- Marketing services, which provides you with information regarding the products and services offered by Tradingclub or its
 partners and opportunities that we believe may be relevant to you
- Newsletters
- SMS (text) messages
- · Other electronic communications.
- Shopping Luxuries

If you no longer wish to receive the above mentioned types of messages, you may opt-out by following the instructions included in each message.

Updating Your Information

You may inform Tradingclub at any time that your personal details have changed or that you wish Tradingclub to delete personal information we hold about you by emailing us. We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records. In any case, Tradingclub may keep any aggregated or anonymized information for the purposes described in this Privacy and Security Policy, indefinitely.

Links

When you use this website, you may be able to link to other websites. This Privacy & Security Policy does not apply to those other sites.

Cookies

Cookies are small files of information, which often include a unique identification number or value, which are stored on your computer's hard drive as a result of you using the Tradingclub trading software and accessing the Tradingclub website. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. Session ID cookies are used in order to allow you to access your account online.

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Persistent cookies remain on your hard drive for an extended period of time. Persistent cookies are used only to collect statistical information referred to above. Most internet browsers are set up to accept cookies.

If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we provide to you in relation to your account. Some persistent cookies, such as Flash cookies, cannot be blocked by changing your browser's settings.

Remarketing with Google Analytics

We may use the information we collect to assist us in delivering relevant ads to you (Remarketing). Remarketing is a way for us to connect with our websites and ads visitors, based upon their past interactions with our website and ads. Third-party marketing vendors may be hired by Tradingclub to perform such remarketing services. As a result, third-party vendors, including Google, may show Tradingclub's ads on internet sites. Such third-party vendors, including Google, may also use their cookies, third party cookies and similar technologies to serve ads based on a visitor's prior visits to Tradingclub's website.

Security

Tradingclub takes security very seriously and makes efforts to protect your personal information and ensure it is not accessed by unauthorized persons. Measures include encryption during data transmission, strong authentication mechanisms and separation of machines and data to provide secure areas.

While such systems and procedures reduce the risk of security breaches, they do not provide absolute security. Therefore Tradingclub cannot guarantee that our service will be immune from any wrongdoings, malfunctions, unlawful interceptions or unauthorized access to the information stored therein and to other information security risks, or that your private communications on or through our service will remain private.

What are Your Rights?

You need not give us any of the personal information requested by Tradingclub. However, without the information requested in the application form, Tradingclub may not be able to open an account for you, or to provide you with any other services, information or assistance you have sought or evaluate the appropriateness of the service you are requesting.

How to request a copy of information

You need not give us any of the personal information requested by Tradingclub. However, without the information requested in the application form, Tradingclub may not be able to open an account for you, or to provide you with any other services, information or assistance you have sought or evaluate the appropriateness of the service you are requesting.

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How to request a copy of information

If you have a request, please write to Tradingclub, verifying your identity and setting out in full what information you require. We will charge a fee as allowed by applicable law to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

Amendments to Policy

Tradingclub may change and update the terms of this Privacy and Security Policy from time to time. All changes will take effect seven (7) days after their initial posting on the Website, unless Tradingclub amends this Policy to comply with legal or regulatory requirements, in which case the amendments will become effective as required, or ordered.