

PRIVACY POLICY

1. Introduction

Welcome to Empire Trading Limited ("we", "us" or "our"). We are committed to protecting and respecting your privacy in accordance with the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Controller Details

Empire Trading Limited is a company incorporated in England and Wales (Company No. 16411406), with its registered office at 71-75 Shelton St, Covent Garden, London, United Kingdom, WC2H 9JQ. We act as the data controller for the personal data we collect and process.

3. Information We Collect

We collect and process the following categories of personal data:

- **Identity Data:** Name, date of birth, gender.
- **Contact Data:** Email address, postal address, telephone number.
- **Account Data:** Username, password, transaction history, account settings.
- **Technical Data:** IP address, browser type and version, time zone, cookie identifiers.
- **Usage Data:** Information about how you use our website and services.
- **Marketing Data:** Preferences for receiving marketing communications.

4. Lawful Bases for Processing

We rely on the following lawful bases under UK GDPR:

- **Performance of Contract:** to provide our simulated trading services and manage your account.
- **Legal Obligation:** to comply with statutory and regulatory requirements (e.g., HMRC record-keeping).
- **Legitimate Interests:** to improve our services, maintain security, and prevent fraud.
- **Consent:** to send you marketing communications (you may withdraw consent at any time).

5. How We Use Your Data

Purpose	Data Used	Lawful Basis
Account setup & service delivery	Identity, Contact	Performance of contract
Customer support	Identity, Contact	Performance of contract
Service improvements & security	Technical, Usage	Legitimate interests
Marketing & newsletters	Contact, Marketing	Consent
Compliance & audit	Account, Transaction	Legal obligation

6. Data Sharing and Transfers

We may share your data with:

- **Service Providers:** payment processors, IT and hosting providers, analytics vendors.
- **Regulators and Authorities:** where required by law (e.g., HMRC, FCA).
- **Professional Advisors:** legal, audit, insurance services.

When transferring data outside the UK ("third countries"), we use appropriate safeguards such as UK GDPR-approved Standard Contractual Clauses or rely on adequacy decisions.

7. Data Retention

We retain personal data only for as long as necessary:

- **Transactional Records:** 6 years to comply with HMRC requirements.
- **Account Data:** for the duration of your account plus 2 years.
- **Marketing Consent Records:** until consent is withdrawn plus 1 year.

- **General Enquiries:** 1 year after resolution.

8. Your Rights

Under UK GDPR, you have the right to:

- Access your personal data.
- Rectify inaccurate data.
- Erase data («right to be forgotten»), where applicable.
- Restrict or object to processing.
- Data portability.
- Withdraw consent at any time (for processing based on consent).
- Lodge a complaint with the Information Commissioner's Office: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; www.ico.org.uk.

To exercise any of these rights, please contact our Data Protection Officer at support@empiretrading.co.

9. Cookies and Tracking

We use cookies and similar technologies to:

- Enable core functionality of our website.
- Analyse site usage and performance.
- Deliver marketing tailored to your interests.

10. Children's Privacy

Our services are not directed at children under 18. We do not knowingly collect personal data from minors.

11. Changes to This Policy

We may update this Privacy Policy from time to time. We will notify you of significant changes via email or by posting a notice on our website with the effective date.

12. Contact Us

For questions about this policy or our data practices, please contact:
Data Protection Officer

Empire Trading Ltd
71-75 Shelton St, Covent Garden, London, United Kingdom, WC2H 9JQ
Email: support@empiretrading.co

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