



TradeSpot

Website And Services
Privacy Policy

Last Updated
November 3, 2022

1. Introduction

As part of our daily business operations, we collect personal information from our clients and prospective clients in order to provide them with our products and services, and ensure that we can meet their needs when providing these products and services, as well as when providing them with any respective information.

This Privacy Policy governs privacy of the Users (you, your) of the <https://tradespotfinance.com> website ("Website") and <https://app.tradespotfinance.com> website ("Services") served and operated by us, **TRADESPOT FINANCIAL SERVICES LLC** ("we", "us", "our", "TradeSpot") and describes what personal data ("Data") is collected and how it is used, processed, stored and managed by us, under the applicable legislation, while you use our Website and Services.

We are a company duly incorporated in **St. Vincent and The Grenadines** under **company number 2897LLC2023**, with a registered address at: **Euro House, Richmond Hill Road, Kingston.**

Before getting aware of this Privacy Policy, we advise you to carefully read our User Agreement and AML Policy, in order to get comprehensive insight into the terms and rules referred to our Website and Services use.

If you use our Services, this means that you have read all the mentioned terms and rules.

By consenting to use our Website and Services, you expressly state that you're providing us with only true and accurate information, and that you agree with this Privacy Policy and expressly consent to and agree with your Data processing as stipulated herein.

2. General Provisions

This Privacy Policy shall be governed by, construed, interpreted, and enforced in accordance with the laws of EU regulations. These agreement provisions may be not applicable exclusively in cases where the applicable and governing law prevails or supersedes. If any provision of this Privacy Policy is, or is found to be, inapplicable or unenforceable under the law, that will not affect the applicability or enforceability of the other provisions of this Privacy Policy.

We reserve the right to alter, vary and revise this Privacy Policy, whenever lawfully required or in view of marketing, commercial, technological, whatever upgrade or as we deem necessary, with considering the applicable law. Such revised or updated versions shall apply from the date of publication, unless otherwise expressly stated. By using our Website and Services and any such revised or updated versions, you agree with and accept the terms of this Privacy Policy regarding the updates.

Where you have provided us with your consent to use, store or disclose your Data, you have the right to withdraw such consent at any time by emailing us at compliance@tradespotfinance.com. We will cease using your Data, unless we are required not to do so by law. Please, note that after that you may not access certain

facilities or features provided to you based on or subject to your Data. Please read [Data Management](#) and [Restriction of Processing](#) clauses herein for details.

Under the applicable law, you have the right to request information about the Data that we have collected about you, in case you should address such a request to the aforementioned email address.

3. Data Collection

We may collect and process your personal Data, as follows:

- Your email address, first name and last name, date of birth, residential address, postal address, contact phone number;
- Identity documents, occupation, employment industry, financial standing;
- Any other documents or information deemed necessary in order to comply with regulatory obligations;
- Preferences, interests, favorites;
- Data regarding your payment transactions, transactions activity log, billing, payment details and other financial and settlement details obtained by us when you use our Services, in order to effect and administer your operations;
- Domain and host from which you access the Internet, your computer's or other usable device's IP address, web browser type and the operating system software;
- The date and time you access our Website or Services;
- The address of the website from which you linked to our Website when you visit us;

- We collect your Data during your current and for future Website or Service visits and use, as provided below in the [Cookies](#) section.

4. Data Usage and Security

We may use your personal Data, as follows:

- To operate our Website and deliver our Services properly (which may include disclosure to relevant Third Parties as set forth);
- To provide general statistics regarding use of our Website or Services;
- To send you email communications regarding Service procedures;
- To send you occasionally our Services updates;
- To contact you for surveys purposes (you have no obligation to respond to such surveys);
- To maintain accuracy of our records;
- To verify your Data for the purpose of managing our customer relationships and observing the Know Your Client (KYC) and Know Your Business (KYB) rules;
- To comply with legal and regulatory obligations with respect to Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), prevention of criminal activity and lawfully protect our legal interests;
- To keep our Website and Services safe and secure.

For the purposes of the applicable law, we are the “Data Controller” of your personal information and we will securely retain any Data submitted by you to us.

Unless we are obliged or permitted by law to do so, and subject to our relevant Third Parties business relationships (our partners, service providers, contractors, agents, financial institutions, social media, without limitation), we will not disclose your Data to any irrelevant Third Parties, for the purpose of security matters.

Data security is highly important to us and to protect your Data we will organize and take all the necessary and appropriate measures and technologies to safeguard and secure your Data collected through the Website and Services.

To use all features and functions of our Services, you may be required to submit certain Data, including password(s). You are responsible for keeping your password(s) confidential and safe.

While we seek to do our utmost to protect your Data, you need to keep in mind that transmission of any information over the Internet is not entirely secured and is implemented at your own risk and discretion. We, therefore, cannot ensure the security of your Data transmission to our Website or Services, whenever that is beyond our reasonable control.

You undertake to notify us immediately of any unauthorized access or use of your account or any other breach of security by email: info@tradespotfinance.com.

5. Data Portability

You may request a snapshot of your personal Data in computer readable form to be delivered to you or a third party you designate by emailing us at info@tradespotfinance.com.

6. Data Management

You may amend or remove any portion of your personal Data at any time by using Services interface, or emailing us at info@tradespotfinance.com. Such amendment or removal of certain Data may lead to limiting or cessation of your access to Services.

Please note that we are legally obligated to save all previous instances of your Data in accordance to [Restriction of Processing](#) clause as set below.

7. Restriction of Processing

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations require us to store your personal Data for at least 8 years. Upon amendment or removal of your Data, it is archived and safekept separately from processed Data (i.e. Restriction of Processing rules apply). Such restricted Data is stored without processing and cannot be accessed automatically or by unauthorized personnel. Restricted data may

only be used or restored only in select ways prescribed by law or legal proceeding. Upon expiry of storage term, restricted Data is deleted.

8. Cookies

Cookies are small text files saved to your computer or any usable device, which help us track, save and memorize data about your actions on and use of our Website or Services.

Cookies help us to enable functionality for provision, protection and enhancement of our Services, to record your browsing activity, to verify your account, to determine when you are logged in, to keep your data and account safe and secure, to enable adverts and behavioral advertising, to provide mailings, analytics and research, to monitor statistics data, to retain your preferences and information about your actions allowing us to improve your usability and to provide you with the best possible experience on our Website. In addition, since our Services are based on fulfillment of finance and settlement transactions, your activity will be ensured by the Cookies that help us duly and accurately enable your transactions.

When you use and access our Website, we may use essential cookies to authenticate you and prevent fraudulent use of your account. We may use session cookies, persistent or permanent cookies, and third party cookies.

We may also use the other websites cookies , inter alia, to gather and analyze various statistics data regarding our Website, as well as for notifications and newsletter messages made through our Website regarding the other

websites news, promotions, or whatsoever information. We will also use the social media buttons on our Website for your transfer to the appropriate social networks. The Third Parties' external websites use their own Cookies in relation to their own cookies policies, for which we are not responsible. If you accept them, you use them at your own risk and discretion, without our responsibility.

9. Third Parties

We use or may use facilities of other relevant Third Parties (our partners, service providers, contractors, agents, financial institutions, social media, without limitation), in order to provide our Services and deal with certain processes necessary for the operation of the Website. In that regard, such relevant Third Parties will have access to respective personal Data provided by you.

On our Website and Services we include or may include the references or links to the Third Parties websites. External links may be clickable texts, banners, image links to other websites, without limitation. We do not control outbound Websites, nor take responsibility for their content, terms of service or any policies. This Privacy Policy governs only specifically our Website and Services and does not extend to your use of other websites, even those of our partners and Service providers, social media, etc. We, therefore, advise you to review the privacy policy for other websites prior to using them.

We may transfer our rights and obligations under this Privacy Policy, where we reasonably believe your rights will not be affected. You may not transfer

any of your rights and obligations under this Privacy Policy to any other person or otherwise deal with your rights and obligations under this Privacy Policy.

10. Social Media

We may have official profiles in social media networks. We advise you to verify the authenticity of such profiles before using them. We will never ask for your passwords or personal details in social media networks. When interacting with social media, you do so at your own risk and discretion.

11. Downloadable Data

Any downloadable documents, files or media made available on and through our Website or Services are provided to you at your own risk. While we stick to any measures regarding genuine downloads, we, however, advise you to verify the downloads authenticity and safety, including by the use of antivirus programs. We accept no responsibility for downloads from Third Parties or external websites.

12. Email And Marketing Messages

Where we informed you and where you agreed, we may use your Data to send you notifications about our Services, various profile news, updates regarding our activities by virtue of email newsletters mailing. Email mailings

and marketing messages may contain technologies to track your activities. You may subscribe or unsubscribe of such mailing, contacting us by our e-mail info@tradespotfinance.com or through details provided in that message.

13. Third Parties Privacy Policies

Google Analytics

Scope and purpose: used on our Website for tracking and analyzing Website traffic and engagement.

<https://policies.google.com/technologies/partner-sites>

ShuftiPro

Scope and purpose: used for individual user verification and checks (KYC) purposes while enrolling in our Services.

<https://shuftipro.com/privacy-policy/>

Dun & Bradstreet

Scope and purpose: used for corporate user verification and checks (KYB) purposes while enrolling in our Services.

<https://www.dnb.com/utility-pages/privacy-policy.html>

Stripe

Scope and purpose: used as payment processor for credit card payments.

<https://stripe.com/privacy>

Twilio

Scope and purpose: used for automated email communications and/or SMS text messages.

<https://www.twilio.com/legal/privacy>

14. Inquiries

Should you have any questions regarding this Privacy Policy, please contact us at: info@tradespotfinance.com.