

Privacy Policy

Purpose of this Policy

Your privacy is important to us. This Privacy policy provides an overview of how SHINE TRADES CY LTD ("Shine Trades ") processes your personal data. We value the relationship that we have built with you and we place a very high priority safeguarding the data that you have provided to us.

The processing of your personal data by Shine Trades must be in compliance with the provisions of applicable personal data protection law (including the EU General Data Protection Regulation or "GDPR").

This privacy notice describes the kinds of personal and financial information pertaining to you that is collected by Shine Trades when you choose to use our services, how this will be used, when and with whom we share it and how we will keep it safe. The rights provided to you by the GDPR in relation to the processing of your personal data by us are similarly described in this policy.

By accessing any Shine Trades website, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this notice and how we process any information you disclose to us including personal data prior to becoming a client.

By opening an account at any Shine Trades website, you agree that this notice, including any amendments will govern how we collect, store, use, share and in any other form process your personal data and your rights during our business relationship and after its termination.

Changes to our privacy policy and changes to your personal data

The Privacy policy is subject to changes from time to time and it is important that you check this policy for any updates. Any personal information we hold will be governed by our most current privacy notice. Any amendments to be made to this policy that we consider to be important, will be communicated to you.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Who is responsible for processing your personal data and who you can contact in this regard?

Your personal data will be held by the compliance and responsibility for their processing lies with: SHINE TRADES CY LTD with registration number HE 335393, whose head office is at Corner of Soteri Michaelidi and 28th October Street, Lophitis International Center, CY-3035 Limassol.

Types of personal data collected and stored

As part of our business we, use, store and transfer different kinds of personal data from customers and potential customers that include the following:

- Identity Data includes name, surname, passport/ID number, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.
- Contact Data includes billing address, delivery address, email address and telephone numbers, proof of address.
- Professional Data includes level of education, profession, employer name, work experience in Forex/CFD's, information on Client's experience, knowledge in forex industry and risks.
- Tax Data include country of tax residence and tax identification number.
- Financial Data includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, E-wallet information.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences

We may also collect, store and use the following more sensitive types of personal information:

- Information about criminal convictions and offences.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers).

We need to collect your personal data as part of statutory obligations or as part of the contractual arrangements we have with you. If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

How is your personal data collected?

We use different methods to collect data from and about you including through your use of our services and websites, the account opening applications, our demo sign up applications, website cookies, and similar tracking technology built into our Websites, subscribing to news updates and from information provided in the course of our ongoing relationship.

We may also collect this information about you from third parties, publicly available sources, social media platforms, introducing brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.

When and how do we obtain your consent

We may process your personal data for one or more lawful bases of processing ('Lawful Basis') depending on the specific purpose for which we are using your data.

The Lawful basis are the following:

- to perform our contractual obligations towards you
- to be compliant with the legal and regulatory requirements

- to pursue our legitimate interests

Where our use of your personal information does not fall under one of these three Lawful basis we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email list.

Purposes for which we will use your personal data

We may use your personal data for the purposes set out below:

- To register you as a new customer
- To process and deliver your order including:
 - (a) Manage payments, fees and charges
 - (b) Collect and recover money owed to us
- To manage our relationship with you which will include:
 - (a) Notifying you about changes to our terms or privacy policy
 - (b) Asking you to leave a review or take a survey
- To enable you to participate in a prize draw, competition or complete a survey
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences
- To perform automated decision in order to identify your knowledge and experience in Forex industry and to identify your risk profile (Appropriateness and Suitability Test)
- To make suggestions and recommendations to you about goods or services that may be of interest to you

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services or products from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Who may we disclose personal data to

As part of using your personal information for the purposes set out above, we may disclose your information to:

- third party apps providers when you use our apps, communication systems and trading platforms which are provided to us by third parties;
- service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization, financial, regulatory, compliance, insurance, research or other services;
- introducing brokers and affiliates with whom we have a mutual relationship;
- Payment service providers and banks processing your transactions;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
- courts, tribunals and applicable regulatory authorities as agreed or authorized by law or our agreement with you
- government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements;

- anyone authorized by you.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and we endeavor to disclose to those third parties only the minimum personal data that is required to perform their contractual obligations to us. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Our websites may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

How we safeguard your personal data

We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

Shine Trades applies, among others, the below data protection measures for safeguarding personal data:

- we train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals
- requiring our employees to use passwords and two-factor authentication when accessing our systems;
- we apply Chinese walls and employees only have access to the personal data required for the purposes of the tasks they handle.
- we apply data encrypting technologies during data transmission during internet transactions and client access codes transmitted across networks
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorized persons and viruses entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- practicing a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records; and

- employing physical and electronic means such as access cards, cameras and guards to protect against unauthorized access.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and we endeavor to disclose to those third parties only the minimum personal data that is required to perform their contractual obligations to us. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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How do we store personal data and for how long

We process and store your personal data as long as necessary for the performance of our contractual and other legal obligations.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship.

These records must be maintained for a period of five years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for us or for

one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

When we transfer your data to other third parties outside the EEA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements

If you would like a copy of such arrangements, please contact us using the contact details provided in this policy.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You can exercise them at any time by contacting us.

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the

data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Filing a complaint

You may exercise your rights at any time by contacting us in the following ways:

- By submitting your request in our head office at Corner of Soteri Michaelidi and 28th October Street, Lophitis International Center, CY-3035 Limassol
- By sending an e-mail to complaints@shinetrades.com

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the Commissioner for Personal Data (CPD), the Cypriot supervisory authority for data protection issues. Alternatively, you also have the right to lodge a complaint with the data protection authority of your country of residence.

You can find details about how to do this on the following website:

<http://www.dataprotection.gov.cy>