

# **Zenith Markets PLC**

**Privacy Policy**

January 2025

The logo for tradgrip, featuring the word "trad" in black and "grip" in blue, both in a bold, lowercase sans-serif font.

This Privacy Policy (the “Policy”) explains how the Zenith Markets PLC, registered in Comoros Union, with registration IBC number HT00324011 authorized and regulated by the regulated by the MWALI International Services Authority (hereinafter the “MISA”) with a brokerage license number BFX2024031 (hereinafter as “TradGrip”, “we” or “us”, “Company”) collects, uses and discloses personal information through its websites, mobile applications, trading platform and other online products and services that link to this Policy, including any of the products and services as per the Company’s license (collectively, the “Services”) or when you otherwise interact with us.

We encourage you to read the Policy carefully as it forms part of the relevant TradGrip’s Terms and Conditions, and/or Agreement, as the case may be.

If you accept or agree to this Policy on behalf of a company or other legal entity, you represent and warrant that you have the authority to bind that company or other legal entity to the Privacy Policy and, in such event, “you” and “your” will refer and apply to that company or other legal entity.

## 1. Application of this Policy

- 1.1 For the purposes of applicable state and/or international data protection laws, the respective Company with whom you have registered is the “controller” of personal information collected through [www.tradgrip.com](http://www.tradgrip.com), other websites, widgets, mobile application(s) or/and other platforms (together the “Site”), and is the company to contact if you have questions about the use of your personal information (see the “Contact Us” section below). The Policy also applies to personal data about each authorized representative of a client and about other persons or entities where this personal data is collected in the course of providing the Services (such as directors of corporate clients).
- 1.2 TradGrip is not available for users under the age of 18 or the age of legal consent for the jurisdiction the user is located in (a “Minor”). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us.
- 1.3 If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a Minor has shared any information with us, please contact us at [support@tradgrip.com](mailto:support@tradgrip.com).

## 2. We collect personal information:

### A. That you provide directly to us:

- 2.1 We collect information you provide directly to us. For example, we collect information when you create an TradGrip Account, participate in any interactive features of the Services, fill out a form, make an order, communicate with us via third party social media sites, request customer support, or otherwise communicate with us.
- 2.2 We also collect information when you sign up or when register to your TradGrip Account or other Services, we will collect basic information about you including your full name, email address and telephone number. You may provide this information to us directly, or by signing in to your account/service with a third party, including without limitation, Facebook or Google (see

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“Information We Collect from Other Sources” below). We will use the information that we collect about you to

- a) Open and maintain your TradGrip Account;
- b) Allow you to log in to your TradGrip Account;
- c) Contact you about your TradGrip Account and/or our Services. This might include email communications for marketing purposes).

**B. When Completing our Online Application Form:**

- 2.3 Once you have created a TradGrip Account, we will ask you to provide additional information to allow you to make use of certain functions. We will ask you to provide a copy of an identification document, such as a passport, residency permit, visa or national identity card, a utility bill and such other documents as may be required by us in order to comply with our regulatory obligations and to verify your identity. Further details about the identification process can be found in our Terms and Conditions and AML Policy.
- 2.4 Please note that if you choose to complete the Online Application Form, then the information we ask for may include your gender, date of birth, place of birth, addresses, nationality, national insurance number, social security number (or other government issued identification number), citizenship and residency status, Tax ID, and information about your experience trading, education, source of income, investment aims and appetite, occupation, employer and employment position, annual income, investment portfolio, total cash and liquid assets and other details or questions as may be required or as amended by us from time to time.
- 2.5 It is optional for you to do so but for legal and regulatory reasons you will be unable to proceed to use certain features unless you provide further information.
- 2.6 We will use the information you provide in the Online Application Form to verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, “Know Your Customer” (KYC), Anti-Money Laundering, fraud, sanctions and Politically Exposed Person (PEP) checks. Further we will use the personal information you provide to:
  - a) contact you on matters related to your TradGrip Account, including to request any additional information or documentation;
  - b) provide you with notices related to your TradGrip Account, general updates, market updates and other marketing materials;
  - c) tailor the products and services offered through the website to you, including without limitation, to perform any appropriateness assessments for using our services and/or products;
  - d) assess your risk score according to parameters determined by TradGrip;
  - e) assess whether you qualify as a professional client, wholesale client or other specific category of client;
  - f) maintain administrative records relating to our business;
  - g) set up security measures to secure your account, including without limitation, to carry out two-factor authentication; and
  - h) provide the Services in line with our Terms and Conditions.

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2.7 We recommend that you inform us on updates regarding your profile regularly, to ensure that the TradGrip functions offered to you are appropriate for your current circumstances.

2.8 You further agree to update such information upon TradGrip's request, if TradGrip considers the information provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of our services to your profile.

2.9 You accept that the not provision of data that is a mandatory field in the Online Application Form we will be unable to offer TradGrip's full functionality to the Services.

**C. When You Contact Us:**

2.10 If you contact us by telephone, email, post or use another function offered by TradGrip, such as the chat feature, we will collect any information about the communication and any additional information that you choose to give us. We will use this information to review, investigate and respond to any comment or question that you may raise. Please note that we record and retain all telephone calls and other communication with us and may use it in our dealings with you, including any dispute resolution or legal proceedings.

**3. Automatically Collected Information**

3.1 When you access or use our Services, we automatically collect information about you (the type of information depends on the Site you are using), including:

<b>Financial Information</b>	We collect financial information related to your use of the Services, that is provided from you or is obtained via public sources. This may include records of activities on the Site, including our TradGrip Account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.
<b>Log Information</b>	Type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers.
<b>Equipment Information</b>	We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
<b>Location Information</b>	In accordance with your device permissions, we may collect information about the geographic location of your device.
<b>Cookies and Other Tracking Technologies</b>	We use different technologies to collect information, including cookies and web beacons. You can find out more about TradGrip's use of cookies and similar technologies in our Cookie Policy.

#### **4. Information we collect from other parties**

- 4.1 We may collect personal information about you from third party entities when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, online background check portals and similar bodies. We may also collect information about you from third parties, when you use or connect to TradGrip by or through a third-party platform, such as Facebook or another site, you allow us to access and/or collect certain information from your third-party platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third-party platform for their use.
- 4.2 Some of the information we collect from you on installation of the mobile app will be shared by us with vendors and other service providers who are engaged by, or working with, us in connection with operating and analyzing the Services we provide to you.

#### **5. Unsolicited Information**

- 5.1 If you provide us with personal information that we have not requested, then we will endeavour to only retain the information that we are entitled or required to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

#### **6. Use of Information**

- 6.1 We use the information we collect to provide, maintain, and improve the Services, such as to administer, verify and maintain your account, to provide the Services you request and customize your experience with us. We also use the information we collect to:
- carry out our obligations owed to you;
  - comply with our regulatory and other legal obligations;
  - monitor/access any content you post;
  - administer transactions including deposits, chargebacks and payments;
  - monitor trading activity on TradGrip, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities;
  - determine whether a payment method is being abused;
  - compile statistical analysis of the pages of our platform and websites;
  - monitor and analyze our business;
  - investigate and to manage enquiries, disputes and legal proceedings and to comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;

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- provide information about you and your trading with us to credit reference/reporting agencies;
- participate in crime prevention, legal and regulatory compliance and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement, even if not compelled to do so;
- develop and to market other products and services; and
- novate, transfer or assign any of the rights or liabilities of the TradGrip.

## 7. Sharing of Information

7.1 We will not share the personal information we hold about you except in the following circumstances:

- between and among the TradGrip, TradGrip and our current and future partners, affiliates, subsidiaries, and other companies under common control and ownership; and
- with professional advisors, vendors, consultants, and other service providers, such as payment service providers, IT hosting companies, banks, other financial institutions and credit reporting/reference agencies who need access to such information to carry out work on our behalf;
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of TradGrip by another company;
- disclosure in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of TradGrip or others; or;
- where we have your consent.

## 8. Advertising and Analytics Services Provided by Others

8.1 We may allow others to provide analytics and advertising services about our products and services on our behalf across the web or/and mobile applications. This may involve cookies and other technologies to collect information about your use of the Services.

8.2 This information may be used by TradGrip to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services, and better understand your online activity in connection with the Services. Please refer to our Cookie Policy for more information about the cookies involved and the process of consenting or refusing cookies.

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## 9. Your Rights

9.1 You have rights and protections under the law regarding the processing of your personal data. For example, you have the right to object to, or request that we restrict certain processing and, in some circumstances, to obtain a copy of the personal information in machine readable format. There are limits to such rights where they apply and in certain circumstances we may not be required or able to meet your request, or we may only meet your request in part. Please refer to the table below for more details:

<b>The Right to Access</b>	You have the right to access your personal data at any time. To exercise this right, you can request us to provide you with a copy of the personal data we keep about you.
<b>The Right to Rectification</b>	You have the right to request the correction/rectification of any incomplete or inaccurate data we hold about you. In this respect, we may need to verify the accuracy of the new data you provide to us.
<b>The Right to be Forgotten</b>	<p>You have the right to request us to delete/erase your personal data where it is deemed that the purpose of processing it has been completed. Additionally, you may request us to delete your personal data in case you have successfully exercised your right to object to the processing, where we may have processed your data unlawfully, or where we need to delete your personal data to comply with the law.</p> <p>We will proceed with your request unless there is a reason to object to such a request in line with the applicable law or our rights disclosed herein.</p>
<b>The Right to Object</b>	<p>You have the right to object to the processing of your personal data when is carried out for direct marketing purposes. Moreover, you can object to the processing of your personal data on grounds relating to your particular situation based on your legitimate interest and if you feel that the processing has an impact on your fundamental rights and freedoms.</p> <p>If you exercise your right to object, we will no longer process your personal data unless we demonstrate that we have compelling legitimate grounds that override your interest, rights, and freedoms or for the exercise or defense of legal claims.</p>
<b>Right to Restrict Processing</b>	<p>You have the right to request TradGrip to restrict the processing of your personal data: ➤ where the processing is unlawful, and you oppose its erasure;</p> <ul style="list-style-type: none"> <li>• if you want us to establish the accuracy of your personal data;</li> </ul>

	<ul style="list-style-type: none"> <li>• when we no longer need your personal data for the purposes of the processing, but we are required by you for the establishment, exercise, or defense of legal claims;</li> <li>• if you have objected to our use of your data but we are in the process of verifying whether we have an overriding legitimate grounds to use it.</li> </ul>
<b>The Right to Data Portability</b>	You have the right to request the transfer of your personal data to You or another party in machine-readable format.
<b>The Right not to be Subject to automated Decision-Making</b>	You have the right not to be subject to a decision when it is based on automated processing, and it produces an adverse legal effect or significantly affects you.
<b>The Right to Withdraw Consent</b>	To the extent that the legal basis for the processing is your consent, you have the right to withdraw from that consent at any time. Such a withdrawal request cannot have any impact on the lawfulness of any processing carried out before the withdrawal of consent.
<b>The Right to Complaint</b>	You have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of personal data relating to You infringes the applicable regulation.

9.2 If you would like to exercise any of these rights, you can reach us by email at [support@tradgrip.com](mailto:support@tradgrip.com). If you wish to delete or deactivate your account, please note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

9.3 You acknowledge and understand that in certain circumstances, we may not be required or able to meet your request, or we may only meet your request in part.

## 10. Legal Basis for Processing Your Personal Data

10.1 For transparency purposes where relevant under data protection legislation applicable to our processing of your personal information we process your personal data on the following legal grounds:

- Entering into a Contract with You:

If you have a TradGrip Account or have registered on the Site, our legal basis for processing your personal information is that it is necessary for the performance of the Company's Terms and Conditions and to provide the requested service to you. With respect to an TradGrip Account, this includes facilitating access to our platform, processing payments and executing trades.



- For other justifiable grounds, including legal obligation and legitimate interests:

We process your personal information where necessary for TradGrip to comply with legal and regulatory obligations we are under, and also where it is necessary for legitimate interests we have in conducting our business. These include without limitation:

- Learning about your interests and preferences to contact you with information that is relevant to you and helping us target marketing communications and advertisements for our products and services so that they are more relevant to you.
- Using your pseudonymised details to show you advertising for our products and services on social media platforms, or via other third-party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
- Analyzing and continually improving the Site and the Services to develop new features and ensure the efficient running of the TradGrip's services.
- Detecting and reducing fraud and credit risk.

## **11. Promotional Communications**

- 11.1 You can opt out of receiving promotional emails or text messages from TradGrip by following the instructions in those emails or text messages. If you opt out, we may still send you non-promotional emails, such as service messages about your TradGrip Account or our ongoing business relationship.

## **12. Mobile Push Notifications/Alerts**

- 12.1 With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

## **13. Transfer of Data to Other Countries**

- 13.1 We may process your personal data in countries where the applicable standards and laws may be of a lower standard than those in your home country. In this respect, we will take steps to ensure that your personal data receives an adequate level of protection. In case you reside within the European Union and your personal data is transferred to a service provider for processing in any country outside the EEA, that is not recognized by the EU Commission as providing an adequate level of protection for personal data, we ensure that there are in place appropriate safeguards. The transferring of personal data shall be carried out for the purposes explained herein.

## **14. Retention of Personal Information**

- 14.1 We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. For example, if you are invited to use

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TradGrip by another user, we will store the personal information about you provided by such other user for a period of six months in order to send an invitation to you by email.

- 14.2 If you have an TradGrip Account, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us.

## **15. Safeguarding of Personal Information**

- 15.1 We maintain appropriate physical, electronic, technical, and organisational procedural safeguards and security measures, ensuring the protection of your personal data against unauthorized access, use, alteration, disclosure, or destruction of personal data. We protect your personal information by using data security technology and using tools such as firewalls and data encryption.
- 15.2 We restrict access to personal information at our offices so that only officers and/or employees with a legitimate business purpose can access it. We provide access to your personal data to authorised personnel, directors, and shareholders to the extent that such access facilitates the provision of our services and the purposes for which such data was processed.
- 15.3 You need also to ensure that your personal data are kept safe e.g. keep credentials provided to you secure and confidential. It is strictly prohibited to share your login credentials (incl. username and password) with other physical or legal persons. In the case you become aware that your passwords were stolen, or lost, or you suspect that there was an unauthorised use of your account, please contact us immediately.

## **16. Updates to this Privacy Policy**

- 16.1 The Policy will be reviewed and updated from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate in light of any changes in law, technology and the business environment. Any personal information held will be governed by our most current Policy. Please refer back to the Policy on a regular basis.

## **17. Links**

- 17.1 The Site may include links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such websites. Our Privacy Policy apply only to information collected by us in accordance with this Policy.

## **18. Complaint**

- 18.1 If you have a concern about our processing of personal data that we are not able to resolve, you may have the right to lodge a complaint with the relevant data protection supervisory authority where you reside.

## **19. Contact Us**

- 19.1 Should you have any questions regarding the Policy, please contact us at: [support@tradgrip.com](mailto:support@tradgrip.com). Kindly provide us with all the necessary information to be able to

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handle your query properly. We may require that you provide additional information to verify your identity before allowing you to exercise certain rights outlined above.