

Privacy and security Policy

PLEASE READ THE TERMS OF THIS POLICY CAREFULLY BEFORE USING THE SITE

PRIVACY POLICY

Your rights to privacy are important to us.

We will only use the information that we collect about you lawfully and in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation which the Act implements.

We have therefore put in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of your personal information and against accidental loss or destruction of, or damage to it.

1. **By using our site, you accept these terms;**

   Your access to and use of this website is subject to the terms of this policy, our online Terms of Business and any other legal notices and statements contained on this website. By using this website, you agree to be subject to the following terms. If you do not agree to these terms, you must not use our site or open an account with us. We recommend that you print a copy of these terms for future reference.

2. **Where to find terms that may apply to you**

   This Privacy Policy should be read with the following documents that will all apply to you. Click on the links below to go straight to more information on each area:

   2.1. Our Acceptable Use Policy: https://download.content-uk.com/Valutrades_Terms_And_Conditions.pdf

   2.2. This Privacy Policy.

   2.3. Our Cookies Policy, which sets out information about the cookies on our site: https://download.content-uk.com/Valutrades_Cookies_Policy.pdf

   2.4. Data Protection Notice and Consent to our use of your Personal Data: https://download.content-uk.com/Valutrades_Data_Protection_Notice_Consent.pdf

   2.5. Our Terms of Business: https://download.content-uk.com/Valutrades_Terms_Of_Business.pdf

   2.6. Our Risk Warning: https://download.content-uk.com/Valutrades_Risk_Warning.pdf

3. Why do we have a Privacy Policy?

Valutrades takes your privacy very seriously and Valutrades will comply with the obligations imposed on us by the applicable Data Protection legislation, including the UK Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and any successor legislation to the GDPR or the Data Protection Act 2018 (the **Data Protection Legislation**).

3.1. We shall use personal information provided by you in accordance with the provisions of our Terms of Business and Customer Agreements and in accordance with this policy.

3.2. Your use of our website constitutes acceptance of the terms of this policy.

3.3. Our Privacy Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes and any amendments to this policy will be incorporated in an updated version. Your subsequent use of the website constitutes acceptance of those changes. Any information we hold will be governed by our most recent Privacy Policy.

4. Use of Personal Information

4.1. Valutrades needs to collect certain personal information to be able to offer its range of financial products and services to its customers.

4.2. We will collect and maintain most personal information from customer use of this website. This may be through the use of the application and other types of forms and through active use of the customer trading account. The type of information may include (but is not limited to) your name, address, date of birth, contact details, employment and income, transaction history, areas of the website used and visited and links to and from third party websites. We may also need to collect and maintain information from external sources such as credit reference and identity verification agencies. Periodically we may ask you to voluntarily provide us with information for our marketing or survey purposes.

4.3. In accordance with the terms of your **Data Protection Notice and Consent to our use of your Personal Data**: https://download.content-uk.com/Valutrades_Data_Protection_Notice_Consent.pdf

Valutrades will use your information for the purposes of:

4.3.1. opening and maintaining an account;

4.3.2. confirming your identity and dealing with our compliance obligations;

4.3.3. managing your profile and trading account;

4.3.4. to process payments from you and, where applicable, to you;

4.3.5. to audit the usage of our website including:

4.3.5.1. to administer our website for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

4.3.5.2. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

4.3.5.3. as part of our efforts to keep our site safe and secure;

4.3.5.4. for training purposes;

4.3.5.5. to satisfy and meet our legal and regulatory requirements; and

4.3.5.6. to notify you about changes to our services or products; and

4.3.6. to enable us to provide you with the products and services that you have requested from us and otherwise performing our legal obligations to you.

4.4. If you have provided your explicit consent and unless and until you advise us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new products and services which we consider suitable for you. You have a right to withdraw that consent at any time simply by contacting compliance@valutrades.com or at the address details given below in writing, but please note that this is likely to have an impact upon the products and services we can provide to you.

5. Disclosure of Information

5.1 In the standard operation of our business, we may disclose your personal information to the following (who may be within or outside the European Economic Area):

5.1.1. our associated companies;

5.1.2. successors in title to our business;

5.1.3. our third-party service providers and professional advisors contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services;

5.1.4. credit agencies;

5.1.5. any organisation or person expressly instructed by you;

5.1.6. any relevant regulatory, governmental or law enforcement authority as required by law;

5.1.7. third parties necessary to provide the products and services requested by you;

5.1.8. introducing brokers and affiliates with whom we have a mutual relationship and to attorneys acting under powers of attorney with you,

5.2. We will endeavour to ensure that any transfer outside the EEA is lawful and that appropriate security arrangements apply.

5.3. In order to transfer personal information to third parties in territories that do not yet retain adequate privacy laws, we will look to enter into agreements with the parties to whom we may there transfer your personal information ensuring appropriate and suitable safeguards that would be accepted as adequate within the European Community.

5.4. We require that organisations outside of our group of companies who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Data Protection Legislation and this policy.

6. Security of Information

We take the safeguarding of your data very seriously. All personal information in our possession is held securely. We have put in place appropriate technical, organisational and security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from compliance@valutrades.com

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7. Your duty to inform us of changes

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

8. Data Retention

8.1. We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

8.2. However, we may need to maintain records for a significant period of time. For example: If we hold any personal information in the form of a deed, we will hold this deed in its complete form for a period of 12 years after our business relationship with you has ended; we are subject to certain anti-money laundering laws which require us to retain for 5 years after our business relationship with you has ended a copy of the documents we used to comply with our customer due diligence obligations and supporting evidence and records of transactions with you and your relationship with us; and if we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be 5 years or 10 years after our business relationship with you has ended.

8.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of Valutrades we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

9. Your rights of access, correction, erasure, and restriction

9.1. Under certain circumstances, by law you have the right to:

9.1.1. 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.

9.1.2. 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.

9.1.3. Request **erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

9.1.4. **Object** to processing of your personal information 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. You also have the right to object where we are improperly processing your personal information for direct marketing purposes.

9.1.5. Request the **restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

9.1.6. Request the **transfer** of your personal information to another party.

9.2. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we

transfer a copy of your personal information to another party, please contact compliance@valutrades.com in writing.

9.3. No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

10. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact compliance@valutrades.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Please note however that withdrawing your consent is very likely to impact the services we can provide to you.

12. Questions, Comments and Complaints

12.1. If you have any questions concerning our Privacy Policy, or you would like to change your personal information, or you would like to make a complaint concerning any action of ours which you consider is in breach of our policy please contact our Compliance Department directly. We have appointed a data privacy manager to oversee compliance with this Privacy Policy who can be contacted at, please contact the data privacy manager at compliance@valutrades.com

12.2. We would hope to be able to deal with any complaint you may have to your satisfaction, but you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can find details about how to do this on the ICO website at https://ico.org.uk/concerns/ or by calling their helpline on 0303 123 1113.

13. How we collect your data

Personal Information may be submitted on our website in two areas:

13.1. Public Area

If you provide your name and address on the public area of our website in order to request information about our products and services, you may voluntarily provide additional personal information. You will be asked to provide your Personal Information in this area for the purposes of registering with us and opening an account with us.

13.2. Private Area

If you are already one of our customers and have opened an account with us, you must use a password to enter our website. A "session cookie" is used to enable you to leave and re-enter our website without re-entering your password. Our web server will record the pages you visit within our website. To ensure a good quality of service we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. E-mail is not encrypted to/from either the public or private areas of this website.

14. Card Processing

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

15. External Links

Please take care to review the privacy policies and procedures that apply to any third-party website you visit for these are not covered by this Privacy Policy

Last updated: June 2025