

# Privacy

## Privacy Policy Statement TRADING CENTRAL SA

TRADING CENTRAL (“**TC**”) respects the individual’s need for online privacy. TC protects all Personal Information, as defined in applicable data protection laws and regulations, which individuals may share with TC. As a condition to the use of TC websites and services provided by TC (“**Services**”), you (“**User**”) consent to the terms of this Privacy Policy Statement as may be updated from time to time. This Privacy Policy applies to TRADING CENTRAL SA, its subsidiaries and all TC websites.

Modern information and communication technologies play a fundamental role in the activities of a company such as TRADING CENTRAL SA. TC’s main activity is Financial Research. TC is based in France.

Headquarters: TRADING CENTRAL SA

Address: 11 BIS RUE SCRIBE

City, postal code: PARIS,75009

Country: FRANCE

Master of the data: TRADING CENTRAL SA

Web site: [www.tradingcentral.com](http://www.tradingcentral.com)

Director of publication of the site: Romain Gandon

### Personal Information, data collected and purpose

Personal Information may include such data as: complete name, email, company name, phone number, address, and language used.

Individuals may access TC’s home page and visit certain pages of TC websites without providing Personal Information.

TC collects Personal Information if it is provided voluntarily when individuals use TC websites and Services, including when individuals contact TC Support and Client Success Teams.

TC uses IP addresses, browser types, browser languages, referring URLs, pages accessed, errors generated, time zones, operating systems and other details to analyze trends, and to administer and improve TC websites.

Usage details such as time, frequency, duration and pattern of use, and features used, will be recorded to enhance User experience of TC websites and Services, to meet TC legal and regulatory requirements, and to help TC provide the best possible Services.

Individual’s names and email addresses may be used to inform Users of new services, releases, upcoming events and changes in this Privacy Policy.

TC may receive an individual's **Curriculum vitae** for an employment opportunity within TC's organization. The CV may contain the following data including but not limited to: "Contact details", "Nationality and working visa details", "Personal summary", "Skills summary", "Work Experience", "Education and training", "Hobbies", and "References".. This data will only be accessed by authorized employees, and solely for the purpose of evaluating an individual's application. TC may retain an individual's CV for future employment opportunities. At any time, individuals may exercise their right to access, update, and or remove data by sending an email request to [privacy@tradingcentral.com](mailto:privacy@tradingcentral.com).

**Account related information** is collected in association with an individual's use of TC websites and Services, such as account number, Services purchased, agreement renewal or expiry dates, information requests, and customer success and support requests including details of the requests and subsequent related activity.

### **Automatic collection of information**

As part of the computerized management of the TC customer base TC automatically logs data.

### **Cookies and other tracking technologies**

TC uses temporary and permanent cookies to enhance a User's experience of TC Services. Temporary cookies will be removed from a User's computer each time the User closes their browser. By selecting the 'Stay logged in' option to access TC Services, a permanent cookie will be stored in a User's computer and the User will not be required to sign-in by providing complete login information each time they return to TC websites. TC ties cookie information to a User's login when a User has elected to remain logged in to maintain and recall individual User preferences within the websites.

Technologies such as cookies, web beacons, tags and scripts are used by TC or service providers such as analytics service providers. These technologies are used in analyzing trends, administering TC websites, tracking usage, and to gather demographic information about TC's User base. TC may receive reports based on the use of these technologies by these service providers on an individual as well as an aggregated basis.

User acknowledges that they are aware that their browser allows them to oppose the registration of these "cookies". Should a User refuse these cookies, some features of the websites may not work properly.

To learn more about cookies and web beacons:

[https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie)

[https://en.wikipedia.org/wiki/Web\\_beacon](https://en.wikipedia.org/wiki/Web_beacon)

## **Services and interactivity of Trading Central websites**

TC websites do not allow visitors to communicate with each other or publish information accessible by other Users. TC websites include links to third-party websites and widgets such as Twitter buttons. These widgets may collect a User's IP address, which page they visit, and may set a cookie to enable the widgets to function properly. TC strongly advises individuals to verify the privacy practices of such websites and widgets.

## **Advertisements**

TRADING CENTRAL does not sell advertisements on its websites.

## **Underage**

The use of TC websites and Services is reserved for persons of the legal age of majority (usually 18 years old) and who are not under tutorship or curatorship. By identifying themselves and / or by using the Services of TC websites, Users acknowledge they are of major age according to the applicable laws of their country of residence, or agree to obtain the authorization of their legal representatives.

## **How secure is an individual's data?**

TRADING CENTRAL adheres to a stringent security policy and applies industry standard practices to protect the information TC holds from the following risks:

- Unauthorized access
- Abusive use or disclosure
- Unauthorized changes or alterations
- Illegal destruction or accidental loss

TC forces individuals to use a secure transmission method to send TC personal data.

TC stores User data at TC facilities in Frankfurt, Germany. To prevent loss of data TC also maintains backup copies of data. User data may remain on TC servers even after deletion or termination of a Customer's access to TC Services. TC may retain and use a User's Personal Information and data as necessary to comply with TC legal and regulatory obligations, resolve disputes, and enforce TC rights.

All TC employees and subcontractors who have access to, or are associated with the data are required to respect the privacy of Users personal data. Personal data will not be

communicated to institutions or governmental authorities, except where mandated by law or regulation.

If an individual utilizes TC Websites and Services from a country other than the country where TC servers are located, their communications with TC may result in a transfer of their personal data across international borders. When Users contact TC, TC may provide them with support from a location outside of their country of origin. In this case, the User's personal data will be managed according to this Privacy Policy.

### **Users control data use**

In the event TC elects to use Users Personal Information for any purpose other than as stated in this Privacy Policy, TC will offer Users an effective way to opt out of the use of their Personal Information for such purposes.

### **With whom may TC share Information?**

TC may need to share Users Personal Information and data with TC service providers and business partners solely for provision of TC Services to Users. The purposes for which TC may disclose Users Personal Information or data to TC service providers may include but are not limited to, web analytics and payment processing. These service providers are authorized to use Users Personal Information or data only as necessary to provide these services to TC. TC does not sell Users Personal Information to third parties. TC may share generic, aggregated demographic information which is not linked to any Personal Information regarding visitors and Users with TC business partners. Users acknowledge that laws in various jurisdictions in which TC operates may obligate TC to disclose User information and the contents of a User account to local law enforcement authorities under a legal process or an enforceable government request. In addition, TC may disclose Personal Information and contents of a User account to law enforcement authorities if such disclosure is determined to be necessary by TRADING CENTRAL in our sole and absolute discretion, for protecting the safety of TC Users, employees, or the general public.

### **Investigation of Illegal Activity**

TC may need to provide access to Users Personal Information and data to TC employees and service providers for purposes of investigating suspected illegal activity or potential violation of the terms and conditions of use of TC Services. In such event, TRADING CENTRAL will ensure that such access complies with this Privacy Policy and is subject to appropriate confidentiality and security measures.

### **Payment Information**

In case of Service subscriptions, TC may request credit card or other payment account information, solely for use in processing payments.

### **Regulatory References**

TRADING CENTRAL conforms with the Regulation (EU) 2016/679 General Data Protection Regulation (GDPR). To learn more about this regulation:

<http://eur-lex.europa.eu/eli/reg/2016/679/oj>

TRADING CENTRAL conforms to French law, number 78-17 of January 6th 1978 "Personal Data Protection Act". Individuals have the right to access, change, rectify and delete any information pertaining to themselves (art. 34, French law "Data Protection Act").

### **How to contact TC?**

For further information or questions regarding this Privacy Policy Statement and/or to exercise your individual rights, please contact TRADING CENTRAL by email at [privacy@tradingcentral.com](mailto:privacy@tradingcentral.com) or by post at:

TRADING CENTRAL  
Compliance Department  
11 bis rue Scribe  
F - 75009 Paris

TC will provide a copy of all personal data held for a User within thirty (30) days of receipt of an individual's request. TC shall ask Users for proof of their identity in advance of providing such data. This information will be provided without charge. Users may dispute the personal data held by TC and may request such data is deleted, modified or rendered complete. TC shall not reserve the right to refuse to provide an individual's personal data.

### **Notification of Changes**

TC may modify this Privacy Policy from time to time. In such event, Users will be notified via email and/or a prominent notice published on TC's website. Please contact TC or visit <https://www.tradingcentral.com/terms-and-conditions/> with any matters regarding the use of Personal Information and data.