



Born2trade™

PRIVACY POLICY

Born2Trade Ltd (St Lucia)

www.born2trade.com

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1. Our Commitment

At Born2Trade Ltd, acting under the Born2trade brand, we recognize that the privacy and security of your personal information are of the utmost importance. Safeguarding your personal information is both a legal requirement and fundamental to the trust we build with our clients. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our website, open an account, or use our services.

By accessing our website or services, you acknowledge this Policy. We are bound by the Data Protection Act of Saint Lucia (No. 11 of 2011), and other applicable regulations, ensuring that your personal data is handled lawfully, fairly, and transparently. Where we process personal data of individuals in the European Union or the United Kingdom, or use service providers established there, we also apply the standards of the EU and UK General Data Protection Regulation (GDPR) to the extent they apply.

This Policy is subject to periodic review and may be updated to reflect changes in legal requirements, technological advances, or operational practices. The latest version will always be available on our website.

1A. Who We Are (Data Controller)

The data controller responsible for your personal data is Born2Trade Ltd (St Lucia), Company No. 2025-00375, with its registered office at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia. Questions about this Policy or requests to exercise your rights should be sent to our Data Protection Officer at compliance@born2trade.com (subject line: "Data protection").

2. Data Protection Framework

Born2Trade Ltd is committed to complying with the data protection laws that apply to it. All employees, contractors, and third parties acting on our behalf follow strict standards in the collection, storage, and processing of personal data.

Under this framework, personal data must always be:

- Collected and used fairly and lawfully.
- Processed for limited, specified, and legitimate purposes.
- Used in a way that is adequate, relevant, and not excessive.
- Accurate and kept up to date.
- Retained no longer than necessary.
- Handled according to people's data protection rights.
- Stored securely.

3. Collection and Processing of Personal Information

We may collect and process the following categories of personal information:

- Identity and contact data: name, date of birth, nationality, address, email, telephone number, identity documents and proof of address.
- Financial and KYC data: employment, income and source of funds/wealth, tax residency, trading knowledge and experience, payment details (excluding full card numbers).
- Personal information that you provide when filling in forms on our Website, including details submitted when registering to open an Account, subscribing to our services, or posting material.

- Records of correspondence when you contact us directly or respond to surveys, maintained for administrative and service quality purposes, including recordings of telephone calls and chats.
- Details of any orders or transactions, whether current or historical, that you carry out through our Website or trading platforms.
- Information about your visits to our Website, including traffic data, location data, weblogs, and other communication data, whether required for billing purposes or to understand and improve the use of our services.
- Technical information about your computer or device, such as your IP address, operating system, and browser type. This is used for system administration, fraud and abuse prevention (including identifying linked accounts), service improvements, and reporting aggregated statistics to partners and advertisers, without identifying you as an individual.

4. How We Collect Your Information

We collect personal information directly and indirectly, including:

- Through application forms when opening an account.
- Via documents and identification materials you provide for verification.
- From interactions with our website, mobile app, or trading platforms.
- When you contact us through email, chat, messaging apps or telephone.
- From third-party service providers, credit reference agencies, identity verification and sanctions-screening providers, introducing partners, or publicly available databases, where permitted by law.

5. How We Use Your Information and Our Legal Bases

We use your personal information for the following purposes:

- To establish, maintain, and manage your trading account (performance of our contract with you).
- To process deposits, withdrawals, and trading transactions (contract).
- To comply with legal and regulatory requirements (including KYC, AML, and reporting obligations) (legal obligation).
- To verify your identity and prevent fraud and trading abuse (legal obligation and our legitimate interests).
- To provide you with customer service and technical support (contract).
- To notify you of changes to our services, agreements, or policies (contract and legal obligation).
- To improve our website, platforms, and services through analytics and feedback (legitimate interests, and consent where cookies require it).
- To provide information about products, services, or promotions that may be relevant to you (only where permitted and, where required, with your consent; you may opt out at any time).
- To create anonymized statistical data for internal analysis and reporting.

6. Cookies & Tracking Technologies

Our website uses cookies to enhance your browsing experience, distinguish you from other users, and analyze performance. Cookies allow us to tailor content to your preferences and optimize website functionality.

Non-essential cookies (analytics and advertising) are only used with your consent, which you can give or withdraw at any time through the “Cookie settings” link on our website. For details, please review our Cookies Policy.

7. Disclosure of Information

Depending on the products and services provided, and subject to applicable restrictions on sensitive data, your personal information may be disclosed to:

- Other entities of the Born2trade group, including B2T Technology LTD (Cyprus), which provides IT, customer support and administrative services to us under a data processing agreement.
- Potential successors in the event of a business transfer, merger, or acquisition.
- Third-party consultants, contractors, or service providers who assist us in delivering services (including but not limited to IT support, trading platform and liquidity providers, identity verification, payment processing, customer communication platforms and infrastructure providers).
- Partners or introducing brokers who referred you to us, limited to the information needed to calculate their remuneration.
- Organizations or individuals acting on your behalf, such as financial advisors, brokers, solicitors, or accountants, when requested by you.
- Third parties where disclosure is necessary to complete a transaction, process payments, or provide services you have requested.
- Trade repositories, clearing houses, or similar entities, where required for regulatory or contractual purposes.
- Banks requesting additional information in relation to payments you have made.
- Credit providers, courts, tribunals, regulatory bodies, financial intelligence units, tax authorities or other government authorities in response to legal obligations, regulatory requirements, or when disclosure is otherwise permitted or mandated by law.

We will never sell or lease your personal data to third parties for marketing or advertising purposes.

8. International Transfers of Data

In certain cases, your personal data may be transferred to and stored in jurisdictions outside Saint Lucia, including the European Union (Cyprus) and the countries where our service providers operate. Where this occurs, Born2Trade Ltd ensures that adequate protections and safeguards are in place to maintain the same level of data protection, such as contractual clauses with the recipient.

9. Safeguarding & Security Measures

We take the protection of your personal information very seriously and apply robust security measures to safeguard it from misuse, loss, unauthorized access, modification, or disclosure. Your data is stored in a combination of secure electronic systems and, where applicable, controlled physical records. Access to this

information is strictly limited to authorized employees, affiliates, and service providers who require it in order to carry out their duties in relation to the services we provide.

In addition to organizational safeguards, we implement technical protections such as encryption, secure servers, firewalls, and intrusion detection systems to help prevent unauthorized access. All employees and partners handling client information are bound by strict confidentiality obligations, and we regularly review our internal policies to ensure compliance with applicable data protection laws.

For added protection, we do not store or retain any full credit or debit card information on our systems.

While we make every effort to secure personal data, you should be aware that the transmission of information over the internet carries inherent risks, and for this reason we cannot guarantee the absolute security of data transmitted electronically.

10. Data Retention

We retain your personal data only as long as necessary to:

- Fulfill the purposes outlined in this Policy.
- Comply with legal, regulatory, or reporting requirements.
- Resolve disputes and enforce agreements.

In particular, identification, transaction, and correspondence records are kept for at least seven (7) years after the end of our relationship with you, as required by anti-money laundering laws. Marketing data is kept until you withdraw consent or opt out.

When data is no longer required, we securely delete, anonymize, or destroy it.

11. Your Rights

Under applicable data protection law, you are entitled to exercise a number of rights regarding the personal information we hold about you. You have the right to access your personal data and request a copy of the information we maintain, as well as the right to request corrections or updates where the data is inaccurate or incomplete. In certain circumstances, you may request that we restrict the way we process your information, or object to its use, including for purposes of direct marketing. Where permitted by law, you may also request the deletion of your personal data, and you may withdraw any consent you have given at any time.

Please note that while you are not required to provide us with all the personal information we request, failure to do so may prevent us from being able to open an account for you, complete necessary regulatory checks, or provide certain products, services, or assistance that you may seek from us. Any requests to exercise your rights must be submitted in writing and accompanied by proof of identity to ensure proper verification. We will respond within one (1) month. Requests are free of charge, unless they are manifestly unfounded or excessive.

If you are not satisfied with how we handle your personal data, you may complain to the data protection authority of Saint Lucia or of your country of residence.

12. Your Consent

Where we rely on your consent (for example, for marketing communications and non-essential cookies), we will ask for it separately, and you may withdraw it at any time without affecting the lawfulness of earlier processing. We reserve the right to update or amend this Privacy Policy when necessary, and any

modifications will be published on our website. It is your responsibility to review the Privacy Policy periodically to ensure you remain informed of any changes. We will notify you by email of material changes.

13. Third-Party Links

Our website may contain links to external websites. We are not responsible for the privacy practices, policies, or content of third-party websites. We recommend reviewing the privacy policies of any external sites you visit.

14. Amendments to This Policy

We may amend this Privacy Policy from time to time. Updates will be posted on our website, and the date of the latest revision will be clearly indicated.

15. Contact Us

If you have questions about this Privacy Policy, wish to exercise your rights, or make a complaint, you can contact us at compliance@born2trade.com (subject line: "Data protection") or by post to Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.