

Privacy Policy – Everytrade24 Ltd

Processing of Personal Data in the Context of Financial Services.

Disclaimer

This Privacy Policy explains how Everytrade24 Ltd processes personal data in connection with the use of our services. Please note that our services are subject to certain territorial restrictions.

1. General Information and Scope

This Privacy Policy informs you about how Everytrade24 Ltd collects, processes, and protects personal data when you visit our website, use our services, or communicate with us.

Everytrade24 Ltd is a company incorporated under the laws of the Republic of Mauritius with its registered office at:

Everytrade24 Ltd
c/o AllServ Management Ltd
Office 306, 3rd Floor, Ebene Junction
Rue De La Democratie
Ebene 72201, Republic of Mauritius

The Company is licensed and supervised by the Financial Services Commission (FSC), Mauritius, holding the following licences:

- Global Business Licence (GBL) No. GB25204986, Code: FS-4.1
- Investment Dealer Licence (Full Service Dealer, excluding Underwriting) No. GB25204986, Code: SEC-2.1B

For privacy-related concerns, a dedicated Data Protection Officer (DPO) has been appointed. You can reach them via email at: dpo@everytrade24.com.

For clients residing in Switzerland, the provisions of the Swiss Federal Act on Data Protection (FADP) apply. For clients within the EEA, the General Data Protection Regulation (GDPR) applies where relevant.

2. Categories of Personal Data

We process in particular the following categories of personal data:

- **Identity and contact details:** name, address, date of birth, email, phone number.
- **Financial information:** bank details, trading and transaction history, deposits and withdrawals.
- **KYC/Compliance data:** identification documents, proof of residence, beneficial ownership information.
- **Usage data:** IP address, device details, browser type, login activity, log files.
- **Communication data:** contents of emails, chats, phone calls, or complaint procedures.

3. Purposes and Legal Bases of Processing

Personal data is processed exclusively in compliance with applicable laws. Legal bases include:

- **Contractual obligations (Art. 6(1)(b) GDPR):** opening and managing trading accounts, executing transactions, processing deposits and withdrawals.
- **Legal obligations (Art. 6(1)(c) GDPR):** compliance with regulatory requirements such as AML, KYC, tax reporting, and supervisory obligations.
- **Legitimate interests (Art. 6(1)(f) GDPR):** ensuring IT security, preventing fraud, enforcing legal claims, and improving services.
- **Consent (Art. 6(1)(a) GDPR):** processing for marketing and analytics or use of cookies. Consent can be withdrawn at any time with effect for the future.

4. Technical and Organisational Measures

Everytrade24 Ltd implements comprehensive technical and organisational measures (TOMs) to safeguard personal data, including:

- Encrypted data transmission (TLS/SSL)
- Two-factor authentication
- Firewalls and network security systems
- Intrusion Detection & Prevention systems
- Regular security audits and penetration testing
- Backup and recovery procedures

Hosting:

Our systems are hosted exclusively with leading international hosting and cloud providers certified according to recognized international security standards (e.g. ISO 27001, SOC 2). We ensure that these providers meet the highest standards of security, availability, and data protection.

Everytrade24 Ltd is committed to maintaining the highest possible standards of security and data protection for our clients.

5. Data Retention and Deletion

We retain personal data only as long as required for the processing purposes or statutory retention periods:

- **KYC and identity data:** at least 7 years after the business relationship ends.
- **Trading and transaction data:** at least 7 years, up to 10 years where legally required.
- **Consent-based data (e.g. marketing):** until the consent is withdrawn.

After expiry of retention periods, data will be securely deleted or anonymised.

6. Data Sharing with Third Parties

We disclose personal data only where necessary to provide services or comply with legal obligations, including:

- Payment service providers (e.g. for deposits and withdrawals)
- Banks, brokers, and liquidity providers involved in trade execution
- Technical service providers (e.g. hosting, IT security, platform operation)
- Supervisory and tax authorities, in particular the FSC Mauritius

Transfers to third countries outside the EU or Switzerland are carried out only with appropriate safeguards (e.g. Standard Contractual Clauses, encryption, or equivalent mechanisms).

7. Cookies and Tracking

Our website uses cookies and similar technologies:

- **Functional cookies:** ensure basic functionality (e.g. login, session management).
- **Analytics cookies:** statistical analysis of usage to improve our services.
- **Marketing cookies:** used only with your explicit consent.

You may disable or delete cookies at any time via your browser settings. Further details are provided in our separate **Cookie Policy**.

8. Automated Decisions and Profiling

Everytrade24 Ltd does not engage in automated decision-making with legal or similarly significant effects for clients.

Exception: certain AML/KYC compliance checks may involve automated processes. In such cases, you may request a manual review by a staff member.

9. Data Subject Rights

Under applicable law, you have the right to:

- Access your personal data
- Rectify inaccurate data
- Erase your data (“right to be forgotten”)
- Restrict processing
- Data portability
- Object to processing based on legitimate interests
- Withdraw consent at any time

To exercise these rights, please contact our Data Protection Officer via E-mail:
dpo@everytrade24.com

If you believe your data is being unlawfully processed, you have the right to lodge a complaint with a supervisory authority. For Swiss clients, this is the Federal Data Protection and Information Commissioner (FDPIC).

10. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time, particularly in response to:

- changes in our services,
- legal requirements,
- regulatory obligations, or
- technical developments.

The most recent version will always be available on our website.