

# Privacy Notice

**Last update: 11.11.2019**

This notice describes how Tradelize collects and processes users' data through on Tradelize Platform, including [www.tradelize.com](http://www.tradelize.com) website and mobile application (“Tradelize”). The terms “we”, “us”, “our” refer to Tradelize OÜ, a legal person registered under the laws of Estonia.

*We are committed to safeguarding privacy of our users. We are not going to misuse your data.*

## Controller Details:

**Tradelize OÜ**

**Registered address: Peterburi tee 47, Lasnamäe linnaosa, Tallinn, Harju maakond, 11415**

**Contact email address: [support@tradelize.com](mailto:support@tradelize.com).**

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## Information We Collect from You

### Account Information

To register a user account, we ask you to provide your **login name**, **email address** and create the **password**.

We use/store your email address:

- (a) to verify your identity when you log in to your account;
- (b) to contact you regarding your account or work of Tradelize (support emails), send emails with our newsletters, announcements, and other offers (marketing emails); and
- (c) to comply with our legal obligations. For more info, please refer to our AML/KYC Policy.

We store passwords secured against unauthorized access by using a password hashing function. We encourage you to create a strong password and avoid sharing with other persons for the safety of your account and funds.

To invite other persons to use Tradelize and receive access to certain paid features and services, you can send them a unique referral code created for your account in 'Partnership Program' page on Tradelize. We will process this unique code solely to provide you with incentives promised for inviting other persons to use Tradelize.

You will also be able to create subaccounts or unite with other users in groups to collectively decide on or manage your funds that are listed on Tradelize. Please note, that we do not carry responsibility for actions or dissemination of your information by other users. We encourage you to carefully choose partners who you trust your data.

## **Management of Funds**

Tradelize will create your **wallet with a public address**, where you can deposit your funds in crypto and use them on Tradelize. To withdraw your funds from Tradelize wallet, you will have to provide a wallet address where you want your funds to be transferred.

You will be able to trade and analyze your Demo account, which means that you are not operating with real funds.

You can connect your **accounts on third-party exchanges** with your Tradelize account through the API keys for algorithmic trading. You will be able to use your trading history on Tradelize and third-party exchanges to analyze your trading patterns, trading statistics, including your absolute return, active return, risk rate, sharpe, sortino, max drawdown, amount of trades and trading volume, % of profitable traders, and max profit and loss per trade, and manage your asset portfolio throughout all connected exchanges. These stats apply both to your main and demo accounts.

Through Tradelize, you will be able to set automated asset management rules and settings and create portfolio strategies. You can then sell the access to the strategies to other users, as well as charge the users for mirroring your asset management patterns.

## **Ratings and Performance Index**

Based on the information provided, Tradelize will calculate your monthly- and 24h- profit/loss rate, as well as Monthly Risk rate. A monthly risk rate is counted according to your trading volume, standard deviation, sortino, and the amount of your trading orders and offers.

If you choose so, you will be included in the Tradelize user trading top rating, which is formed based on users' monthly and 24H P/L and monthly risk rates. Other users will see these stats in comparison with other users, along with your login name and profile photo. If they become interested, they can contact you to collaborate.

You can also choose to participate in Tradelize ratings of the most successful paid channels, strategies, and mirroring accounts. In such a case, other users will be able to see how your trading strategies and patterns are successful/profitable in comparing to other traders.

Tradelize will assign you trading performance index, which is counted from one (1) to five (5) points and based on your aggregate score of all your trading statistics and patterns, including on metrics mentioned in 'Management of Funds' Section and your monthly profit/loss proportion, and profit for the whole period of using Tradelize. You can choose to make your performance index public if you want so.

## **Public Profile**

Each Tradelize user has own public profile, which is accessible by other users. The users can see your login name, profile photo, the date of joining Tradelize, a number of your followers and users you follow, your brief bio, P/L rate, performance index, and your portfolio and trading statistics.

You can also publish there your offers for a paid channel, mirroring, and strategies for sale.

You can adjust what information will be seen publicly at your ‘Public Profile’ page.

## **Tradelize Usage Data**

We collect information about your experience – your **history of transactions, orders, trades, device and browser information, login data, IP-address, geolocation data, date, time, and duration of use of Tradelize, links you visited, links, by which you were addressed to Tradelize.**

We use this information:

(a) to give you the control over account active session (give information about logged-in devices, history of orders, etc.); and

(b) to analyze traffic statistics on Tradelize platform.

Also, Tradelize usage data is collected in anonymized and aggregated way to improve Tradelize usability and for marketing purposes. Learn more about it in the section “Analytics” of this notice.

Please note, that certain information, such as the history of transactions, will be stored to comply with legal obligations.

## **Communications with other Users**

You will be able to communicate with other users through private messages, public posts, and comments to posts of other users. Please note, that the messages can be accessed and disseminated by addressed users at their own responsibility, so we recommend to carefully consider the information you are sharing with other users.

## **Communications with Us**

If you need technical support, have a privacy request or any other inquiry, you can contact us and leave your message. In this case, we will inevitably receive some portion of information from you. We will use this information to provide you with help you might need, fix our services, and analyze Tradelize efficiency.

## **Social Networks**

We have Tradelize official pages in social networks, such as LinkedIn. When you **make interactions with our social network pages, such as subscribe to the pages, leave comments or preferences (e.g., ‘like’ our posts)**, we can analyze these data for measuring our efficiency and conduct an analysis of our social media marketing.

## **Cookies**

A **cookie** is a small text file that is downloaded onto your ‘terminal equipment’ (e.g. a computer or smartphone) when you access Tradelize. It allows Tradelize to recognize your device and store some information about your preferences or past actions.

For more information on our use of cookies, please refer to our [Cookie Notice](#).

## **KYC/AML**

To comply with the laws on the prevention of money laundering and terrorist financing, we are required to collect, keep, and analyze the documents that identify you, contact details, history of transactions, verification data, including from third-party sources (e.g., consumer reporting

agencies, public databases, commercial registries, and sanction lists), and other types of information prescribed by law.

We will ensure the confidentiality of the collected information and will not use the data from your KYC/AML profile for any other purposes.

For more information on the KYC/AML procedure and types of information collected for this purpose, please refer to our KYC/AML Policy.

## **Legal Basis for Processing**

### **Provision of Our Services**

We process your account information, information about your funds, your rates and behavior, and your communications data, usage data, and certain types of cookies **to provide you with Tradelize services**. These services include the provision of the platform for funds storage, exchange, and management, trading analytics, placing necessary cookies, and social network features for collaboration with other users. Without this information, we will be unable to provide you with the exchange and other features of Tradelize.

### **Your Consent**

Unless we obtain the **relevant consents from you**, we will not do the following:

- send **e-mails with our newsletters, announcements, and other offers** (marketing emails) to you;
- make you information publicly accessible; and
- collect **personalization and analytics cookies**.

You can withdraw your consent at any time. You can usually do it on the settings page or by contacting us at the email address. The withdrawal will not affect the lawfulness of processing based on consent before. You can also opt-out e-mail subscription by clicking the appropriate button in our e-mails to you.

### **Legitimate Interests**

For marketing purposes, we process your statistics of activity on our Tradelize, your Tradelize usage data. These data help us to understand our target groups and conduct marketing research.

We process data about usage of Tradelize platform to prevent suspicious, fraudulent, or other unlawful activity.

We can also send you occasional emails with Tradelize updates or new products/services, and other emails for the information purpose.

You can also opt-out email subscription by clicking the appropriate button in our emails to you.

### **Legal Compliance**

As discussed afore, we are required to store certain types of information for compliance with laws (e.g. AML/KYC obligations). We will make sure that this information will be treated strictly in accordance with relevant laws, and we will not use this information for other purposes (except as provided in this notice).

### **Acceptable Age**

We do not intend to collect nor process the children's (under 18 years old) personal data. Only individuals, who are already 18 years old, may use our Tradelize and provide information to us.

If we become aware that someone under the age of 18 has provided or attempted to provide us his/her personal information and registered an account, we will use our best efforts to remove the information permanently from our files and delete this account.

## **Third-party Access to Your Information**

### **Analytics**

To analyze our efficiency and conduct marketing research, we use the services of analytics providers.

When using the analytics services, we can share anonymized and aggregate details of Tradelize use, including, but not limited to traffic data, location data, length visit, other communication data. This information does not allow to identify any certain person, so considered non-personally identifiable information.

Non-Personally Identifiable Information is collected and processed, among other services, by Google Analytics in an anonymized and aggregated way to improve Tradelize usability and for marketing purposes.

Google Analytics is a web analytics service that tracks and reports traffic on Tradelize. Google Analytics uses the data collected to track and monitor the use of our Tradelize. This data may also be shared with other Google services.

For more information on the privacy practices of Google, you can check its Policies at [www.google.com/analytics/policies/](http://www.google.com/analytics/policies/).

### **Other Disclosures**

In addition to the disclosures for the purposes identified before, we may disclose information about you:

- **if we are required to do so by law, in connection with any legal proceedings or to establish, exercise or defend our legal rights.** For example, we may be obliged to save and store the history of transactions made through Tradelize to comply with our legal obligations under the financial laws. If we are asked by the authorized financial regulatory body, we will have to share the data with it; and
- **in case we sell, license or otherwise assign our Company, corporate rights, Tradelize or its separate parts or features to third parties.**

Except as provided in this privacy notice, we will not sell, share or rent your information to third parties.

## **Retaining Your Information**

We will store your information for as long as you use Tradelize and keep your account open. We will not store your information if you delete your account or you do not use the account for more than 2 years.

Please note, that in order to comply with our legal obligations, we will have to store the KYC/AML information for 5 years after termination of the relationship with you (e.g., after a closure of the account or inactivity for more than 2 years).

## Your Rights

To control our data protection activities, you may exercise certain rights regarding your information processed by us. In particular, you have the right to:

- **Object to the processing of your information.** If we process your information in our legitimate interests, e.g., for direct marketing emails or for our marketing research purposes, you can object against it. We will consider your request and, if there are no legal grounds to refuse it (e.g., public interest), stop the processing for such purposes;
- **Access your information.** You have the right to:
  - (a) learn if we process your information;
  - (b) obtain disclosure regarding certain aspects of the processing; and
  - (c) obtain a copy of the information undergoing processing.
- **Verify your information and seek rectification.** If you find that we process inaccurate (e.g., mistakes in nationality, date of birth) or out-of-date (e.g., info on debts, economic activities) information, you can verify the accuracy of your information and/or ask for it to be updated or corrected;
- **Restrict the processing of your information.** When you contest the accuracy of your information, believe we process it unlawfully or want to object against the processing, you have the right to temporarily stop the processing of your information to check if the processing was consistent.

In this case, we will not process the information for any purpose other than storing it or for the legal compliance purposes until the circumstances of restriction cease to exist;

- **Ask us to delete/destroy/otherwise remove the information** about you. If we are not obliged to keep the data for legal purposes, we will remove your information upon your request.

Please note, that the deletion of your information may affect your experience on our Tradelize or lead to close of relationships between you and us if the information was strictly necessary for the provision of Tradelize services; and

- **Ask us to transfer your information to another organization.**

You can complete the request to exercise your right by contacting us at [support@tradelize.com](mailto:support@tradelize.com).

If you believe that our use of personal information violates your rights, you can lodge a complaint with your National Data Protection Authority.

## Security of Information

Your personal information is being stored and processed on the servers of the cloud provider inside the European Union. These servers have technical measures to store the data securely and protected against unauthorized access.

To keep the processing, we may transfer the information outside the European Economic Area, e.g., for the purposes of technical maintenance or software development. In this case, we will ensure that we process the information in accordance with the EU regulations.

We take necessary and sufficient measures, including hashing and encryption of certain information, to protect your information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

Immediate access to some amount of the data is only allowed to our authorized employees involved in maintaining Tradelize. Such employees keep strict confidentiality and prevent unauthorized third-party access to personal information.

## **Changes to Notice**

We may update this privacy notice from time-to-time by posting a new version on our platform. We advise you to check this page occasionally to ensure you are happy with any changes. However, we will endeavor to provide you with an announcement about any significant changes.

## **Third-party Services**

Our Tradelize may contain links to third-party services. Although we choose our partners thoroughly and diligently, we cannot be responsible for the content, terms and conditions or privacy policies of third-party services.

We encourage you to be aware when you leave our Tradelize and to read the privacy statements of the services that collect personal information.

Third-party websites may contain their own cookies. We are not responsible for their usage of cookies.