

**Details of what data we collect from you, what we do with it and who it might be shared with.**

The following information provides an overview of how we (the 'Company') process your personal data, and your rights as a data subject under the EU General Data Protection Regulation (the 'GDPR').

**1. Who is responsible for data protection and how can I contact them?**

**Name:** Guilherme D'Orey  
**Address:** Suite 3, 6th Floor, Airways House, High Street, Sliema SLM1549, Malta (Europe).  
**Email Address:** gdorey@tradeview.eu

**2. What data do we process?** We process personal data that we obtain from our clients in the context of our business relationship. We also process personal data obtained from publicly available sources such as commercial registers, press, media and internet searches which we lawfully obtain and are permitted to process. We process this personal data because processing is necessary for compliance with a legal obligation to which we are subject, which is our legal obligations under current Anti-Money Laundering Laws and Regulations. The personal data processed in this regard is data verifying your identity, media reports, and confirming your details provided to us by you. This data may need to be disclosed to the relevant supervisory authorities, legal advisors and compliance officers/consultants/advisors (see Section: Who do we share your data with?). This data will not be used for automated-decision making (see Section: How will we use this data).

Type of data	Basis for processing	Purpose for which the data will be processed
<b>Personal Data</b> including title, name and surname, residential address, place and date of birth, passport details, identity reference number, identification document details, nationality/ citizenship, and other data in this category	Processing is necessary for compliance with a legal obligation to which we are subject	Complying with our legal obligations under current AntiMoney Laundering Laws and Regulations
<b>Contact Data</b> including contact numbers, mailing address, email address and other data in this category	Processing is necessary for the performance of the contract which you hold with us	Performance of our contractual obligations towards you in the Terms of Business Agreement signed between yourself and the <b>Company</b>
<b>Tax Residency Data</b> including country of tax residence, tax identification number, US tax status and other data in this category	Processing is necessary for compliance with a legal obligation to which we are subject	Complying with our legal obligations under current local and international tax laws including the Common Reporting Standards and the Foreign Account Tax Compliance Act in relation to the exchange and automatic forwarding of tax-related information
<b>Financial Data</b> including source of wealth and source of funds details and documents, origin, amount and currency of assets/ investments, employment/ occupation data, CVs and business/ professional experience details, annual income, net assets and other data in this category	Processing is necessary for compliance with a legal obligation to which we are subject	Complying with our legal obligations under current AntiMoney Laundering Laws and Regulations

<b>Bank Details</b> including account name and account number (IBAN)	Processing is necessary for the performance of the contract which you hold with us	Performance of our contractual obligations towards you in the Terms of Business Agreement signed between yourself and the <b>Company</b>
<b>Personal Background Information</b> including a confirmation whether you are or have been politically exposed, level of education, trading experience and knowledge and other data in this category	Processing is necessary for compliance with a legal obligation to which we are subject	Complying with our legal obligations under current AntiMoney Laundering Laws and Regulations and Investment Services Rules and Regulations
<b>Telephone Communications or Conversations</b> that result or may result in transactions	Processing is necessary for compliance with a legal obligation to which we are subject	Complying with our legal obligations under the Investment Services Rules and Regulations

**3. Why do we collect this data?** We process client data in accordance with the GDPR and primarily for the following purposes:

In certain instances, and where required by our legal obligations under Anti-Money Laundering Laws and Regulations in order to establish/maintain our client relationship, you may be requested to provide us with documentation which contain and verify the above personal data. Kindly note that for such processing we are not required to obtain your consent as the basis for processing.

**4. How will we use this data?** We will not collect personal data about you which we do not need in accordance with the above bases for processing, other than data collected on the basis of your consent. We will process your data in order to establish a business relationship with you (including assessment of whether to establish such business relationship) and to perform the Terms of Business Agreement entered into between you and the **Company** including all related and ancillary matters. We will further process your data in order to comply with our legal obligations in relation to the prevention of money laundering and financing of terrorism, detecting and preventing crime, market abuse and tax evasion, including due diligence, reporting obligations, and the response to queries by authorities. We will further process your data in order to comply with legal requirements towards and requests by regulatory and tax authorities including the submission of returns, reports and replying to request for information from such authorities. We will further process your data in order to protect the rights of the **Company** in case of any legal claims or disputes, including forwarding data to legal advisors and courts, tribunals, mediators, adjudicators and similar bodies/persons. The above will be done through the following processing operations on your data:

- Recording;
- Organising;
- Structuring;
- Storing;
- Adapting or altering;
- Retrieving;
- Consulting;
- Use;
- Disclosing, disseminating or otherwise making available;
- Aligning or combining;
- Restricting;
- Erasing;
- Destructing.

The processing operations will be carried out by our staff internally, unless expressed otherwise in this **Privacy Policy** (refer to Section: Who might we share your data with?). Your personal data will be checked against Google Checks, World Check and other similar portals/databases of Politically Exposed Persons (PEP), heightened risk individuals and sanctioned individuals/entities in order to permit us to comply with our obligations under current Anti-Money Laundering Laws and Regulations and applicable UN and EU Sanctions. This will require us to submit your data to these security due diligence portals and databases.

Your personal data will be processed automatically with the aim of evaluating certain personal aspects (profiling). We use profiling for the purposes of complying with our anti-money laundering and funding of terrorism obligations. As a rule, we do not make decisions based solely on automated processing as defined in Article 22 of the GDPR to establish and implement the business relationship. If we use these procedures in individual cases, we will inform you of this separately, provided this is allowed by law.

**5. Who do we share your data with?** We will never sell your personal data to third parties. We will not share your data with third parties for marketing purposes.

We shall disclose your personal data to third parties where lawful to do so including where we:

- Need to in order to comply with our contractual obligations towards you or with our legal obligations;
- Need to in order to obtain services from such third parties in order to comply with our contractual obligations towards you or with our legal obligations;
- Have a legal duty to do so, e.g. to assist with detecting and preventing fraud, tax evasion, market abuse and financial crime;
- Need to in connection with regulatory reporting, litigation or asserting and defending our legal rights and interests;
- Have a legitimate business interest for doing to manage risk;
- Need to in order to verify your identity in line with our anti-money laundering and funding of terrorism obligations;
- Have been instructed to do so by you.

We shall share your information for these purposes with others including:

- Accountants and auditors for accounting purposes;
- Outsourced compliance officers, compliance consultants and advisors;
- Notaries, lawyers and other such professionals;
- Law enforcement, government, courts, dispute resolution bodies, domestic regulators and European Supervisory Authorities, and any party appointed or requested by regulators to carry out investigations or audits of our activities;
- Anyone who provides instructions on your behalf e.g. attorneys appointed by you through a power of attorney, lawyers, intermediaries etc.;
- Investment advisors and managers where you have approved such relationship;
- Banks and financial institutions where you have approved such relationship;
- Government authorities and/or agencies as required by such authorities/agencies in accordance with law;
- Anyone we have been instructed to share your information with by you.

Where third parties are acting as processors of your data on our behalf, we shall enter into contractual arrangements with such third parties which will require them to process your personal data in accordance with the GDPR, to keep your information secure, and not to use it for their own purposes.

We shall only disclose the personal data that is necessary for such third parties to deliver the required service. We shall also disclose your personal data as required by law to regulatory and enforcement authorities such as tax authorities, courts, magistrates, boards, tribunals and other persons or authorities responsible for the combatting and prevention of crime, tax evasion, and anti-money laundering and funding of terrorism including through the submission of reports where required and/or permitted by law.

We shall also disclose your personal data to local and international banks and/ or other financial intermediaries for the purposes of processing instructions or orders from you in respect of investment services or instruments and satisfying their anti-money laundering and funding of terrorism requirements. We shall also disclose your personal

data to banks and payment services providers for the fulfilment of a transaction ordered or authorised by you or required as part of the Terms of Business Agreement.

We shall also disclose your personal data in accordance with and to the extent allowed by the Professional Secrecy Act and Article 257 of the Criminal Code. We are not required to obtain your consent for such disclosures highlighted in this section.

**6. Where will your data be stored?** Where will your data be stored? Your data will be stored on our physical files located at our premises and on our online servers. We have implemented measures of technology and operational security designed to reasonably protect your soft and hard copy personal data from loss, misuse or unauthorized alteration or destruction. Your hard copy data is hosted on servers located in the EU.

**7. Where will your data be transferred to?**

We do not share personal data with companies, organizations and individuals outside the **Company** unless it is required to do so in the normal course of providing you with the services as agreed in the Terms of Business. The countries we may share your personal data with are within the EU.

If and where personal data is transferred outside the EU, we shall enter into contracts with such third parties which require them to handle your personal data in a manner which is consistent with applicable data protection laws and regulations.

**8. How long shall we keep your data for?**

We will hold your personal data for as long as is necessary:

Data	Retention Period	Basis for Retention
Tax records	6 years	As required by income tax law
Customer due diligence and transactions	5 years, extended to 10 upon authorities' request	As required by anti-money laundering laws
Transactions and processed orders	5 years, extended to 7 upon authorities' request	As required by investment services rules and regulation
Complaints-handling records	5 years	As required by investment services rules and regulations
Telephone conversations and electronic communications that result or may result in transactions made with or received by the <b>Company</b>	5 years	As required by investment services rules and regulations
Transaction reporting records	5 years	As required by investment services rules and regulations
Records of financial instruments/ funds held by the <b>Company</b>	5 years	As required by investment services rules and regulations
Appropriateness assessment, client categorization	5 years	As required by investment services rules and regulations
Data which identifies ownership and beneficial ownership of entities	5 years	As required by tax cooperation law
Books of accounts	5 years	As required by tax cooperation law

Personal data which it needs to maintain for the establishment, exercise of defense of legal claims, disputes and judicial investigations including any agreements signed between you and the <b>Company</b>	5 years	Legitimate interest of the <b>Company</b> to defend itself of legal claims, disputes and judicial investigations
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- To fulfill our contractual obligations towards you;
- To comply with our legal obligations;
- For our legitimate purposes including the establishment, exercise, or defense of legal claims, disputes, judicial investigations, tax and other investigations, to help us respond to complaints and requests from regulators.

The following personal data shall be retained in accordance with the below:

We will review your personal data annually to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except for the retention of your personal data in an archived form in order to be able to comply with future legal obligations as identified above.

We will securely and permanently destroy your personal data once we are no longer obliged to retain it to comply with our legal obligations identified above.

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## 9. What are your rights?

- **Right to Transparent Information:** you have the right to be informed in a clear manner on any personal data pertaining to you that may be processed by us. Such information is being provided to you in this Privacy Policy.
- **Right of Access to Information:** you have the right to request confirmation from us whether personal data relating to you is being processed and if so to access such personal data.
- **Right to Rectification:** you have the right to request from us the rectification, without delay, of any inaccurate personal data pertaining to you.
- **Right to Be Forgotten:** you have the right to request from us the erasure of all personal data pertaining to you without delay, where the data has been processed with your consent as the basis for processing and/or where the processing is no longer lawful.
- **Right to Restrict Processing:** you have the right to request from us the restriction of processing if: processing is unlawful; you are contesting the accuracy of data; the data is no longer required by the controller but you require us to keep it in order to establish, exercise, or defend a legal claim; or if you have previously objected to the processing. Once data is restricted, we cannot process it in any way other than to store it unless: we have your consent; or if it is required for the establishment, exercise, or defense of legal claims; or if it is for the protection of the rights of other persons; or if it is for reasons of important public interest.

- **Right to Data Portability:** you have the right to receive from us personal data which you have provided to us and to transmit that data to another controller without hindrance from us. This right applies where the data is being processed with your consent, or for the performance of a contract, and when processing is carried out by automated means.

- **Right to Object:** you have the right to object at any time to the processing of personal data pertaining to you where the processing is based: on our legitimate interest; or the performance of a task in the public interest/ exercise of official authority, or on direct marketing (including profiling); or on processing for purposes of scientific/ historical research and statistics.

You also have the right to object to profiling based on our legitimate interests or on the performance of a task in the public interest/exercise of official authority.

You also have the right to object to automated decision making, including profiling, and therefore to not be subject to a decision which is based solely on automated processing, including profiling, which produces legal effects or significantly affects you.

Any requests or objections are to be made in writing by mail or email to our Data Protection Representative identified above. In case of email, the **Company** shall contact you in order to verify the authenticity of the request.

## 10. Are you obliged to provide us with your personal data?

Since we require your data for the purposes of accepting and carrying out a business relationship and fulfilling our contractual and legal obligations, should you choose not to provide us with such data, we might not be in a position to enter into a business relationship with you and fulfil the Terms of Business Agreement signed between us and our obligations thereunder. Anti-money laundering obligations require us to verify your identity before entering into the business relationship, for example, by means of your identity card and to record your personal details. In order for us to be able to comply with this statutory obligation, we will ask you to provide us with the necessary information and documents and notify us without undue delay of any changes that may arise during the course of the business relationship. Should you choose not to provide us with such data, we might not be in a position to enter into or continue our business relationship and fulfil the Terms of Business Agreement signed between us and our obligations thereunder.

Reference is made to the Individual/Corporate Customer Account Opening Form whereby you have undertaken to provide us with certain personal data, including documentation, and to inform us of any changes to such data. In these circumstances, the provision of personal data is a contractual requirement. You are never obliged to provide us with any data which we request on the basis of your consent.

## 11. How you can voice your complaints

If you are unhappy with the way in which we have processed your personal data, you may contact our Data Protection Representative on the contact details provided above.

You also have the right to lodge a complaint with the Office of the Information and Data Protection Commissioner, or other supervisory authority of your habitual residence, place of work or place of alleged infringement, and the right to seek an effective judicial remedy before the courts.

## 12. Processing of data through consent

The processing of data highlighted above does not require your consent as it relies on another legal basis. We may however also request to process personal data on the basis of your consent. You are not obliged to give us your consent. Once you have granted us consent to the processing of personal data for identified specific purposes, the processing becomes lawful on the basis of such consent. You can withdraw your consent at any time. If you would like to withdraw consent, please contact our Data Protection Representative on the contact details provided above. Please note that withdrawal of consent does not affect the legality of data processed prior to withdrawal.

At the time of your withdrawal of consent, we may determine that there is another legal ground allowing us to process your data and we shall inform you accordingly.

- Keeping your data updated: We have an obligation to keep your data updated, and for this reason you may be asked about changes to your personal data at various intervals. You are entitled to ask us to modify your personal data if you ascertain that the personal data which we hold is not accurate or updated.

I have read and accept the terms of this **Privacy Policy**.