

TradeZero Europe B.V – Privacy Policy

Introduction

Your privacy is important to TradeZero Europe B.V. (hereinafter “TradeZero”, “we”, or “us”). We want you to understand how we may collect, use, share, and keep information about you and the choices that are available to you. This Privacy Policy sets forth the principal types of information we and our affiliates may collect about you, the purposes for which we use the information, the circumstances in which we may share the information, and other important terms that apply when you utilize our “Services” which are principally our websites (“Sites”), our account funding and/or trading applications (“Applications”), and account administration we provide to our customers.

By using our Services, you consent to the collection and use of your personal information in accordance with this Privacy Policy, as it may be amended from time to time (see “Changes to this Privacy Policy” below).

Personal Information We Collect From You And How We Collect It

Below, we describe in more detail the categories of personal information we may collect from you.

- *Personal Identifiers* – Name, address, date of birth, gender, marital status, email address, telephone number, identifiers we assign to you including account numbers, usernames, account IDs, family information, professional and employment information, and publicly available photographs.
- *Government Identifiers* – Tax identification number, national insurance number, other government issued identification number (i.e., driver’s license, passport, or alien registration), and photographs associated with any government issued identification document.
- *Legally Protected Classification Characteristics* – Age, citizenship, nationality, association with senior political officials and /or executives of government owned enterprises.
- *Device and Online Identifiers and Related Information* – Internet Protocol (“IP”) address, account username/log-in, device information, device type, browser type and version, time zone setting and location, operating system and other technology on the devices you use to access our Services.
- *Internet, Application, and Network Activity* – Emails, activity on our Sites and Applications, including browsing history, search history, clickstream/online website tracking information and other data related to user activity.
- *Location Data* – IP geo-location from which you connect to the internet when using our Sites and Applications.
- *Financial Information* – Account number(s) and other information regarding accounts at other financial institutions, your authority over, beneficial interest in and other information about entities you are associated with; public company affiliations, bank and brokerage account balance information, source of wealth information, investment goals and experience, net worth and liquidity, income, tax classification, and other information regarding your financial circumstances. We may also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.
- *Entity Affiliations and Associations* – Information regarding whether you or an immediate family member are affiliated or associated with certain financial institutions including but not limited to broker dealers, investment advisors, securities firms, securities exchanges, banks, insurance, or trust companies.
- *Audio Data* – Recordings of telephone or similar calls.
- *Transaction Information* – When you receive, submit, or complete a transaction utilizing the Services, we collect information about the transaction, such as, for example, transaction amount, type, time, and date.

We may obtain information about you during direct interactions with us. You may provide us with your personal information (including your national insurance number and other personal identifiers, financial information, government identifiers, and professional or employment data) by filling in forms such as our account application, by contacting us regarding our Services and Applications, or by responding to our marketing activities. We may also obtain information about you collected through Internet cookies (see our Cookie Policy) or through our affiliates, vendors, and other third parties.

We may also obtain personal information about you from publicly available sources and from companies that we do business with, such as consumer and investigative reporting agencies we use to conduct background checks, verify your identity, creditworthiness, and Know Your Customer (“KYC”) requirements. Furthermore, your interactions with our affiliates or third parties linked to our Services outside of the European Economic Area (“EEA”), including but not limited to, TradeZero Holding Corp., TradeZero Canada Securities ULC, TradeZero America Inc., TradeZero USA Inc., TZ Clear LLC, TradeZero Technology Ireland Limited, TradeZero UK Ltd, Vision Financial Markets LLC, various banks and their respective subsidiaries and affiliates, your interactions with our social media sites, advertising campaigns, and other information from publicly available sources, such as public websites, may also provide us with personal information. Please be aware that third-party websites and social media sites are governed by their own privacy policies separate from our own.

Why We Collect And How We Use Your Personal Information

We collect and use your personal information for several important reasons. We use your personal information to provide and optimize our Services for you, which includes, for example, administering your account, communicating with you about your account, processing funding and trading transactions for your account, troubleshooting issues with our Services, resolving technical issues, and managing our relationship with you. We also use this information to satisfy our legal and regulatory obligations including anti-money laundering laws, regulations and KYC requirements. Furthermore, we use such information to help us safeguard your identity and your assets as well as to help us prevent financial crime.

Additionally, we may use your personal information, to the extent permitted by applicable law (or after obtaining your express consent where such consent is legally required), to conduct marketing activities that help us obtain and assess data to improve and develop our Services and our relationship with you. Where legally required for marketing-related communication, we will only provide you with information you have opted in to receive or had an opportunity to opt out of receiving. If you do not wish to receive marketing-related communication from us, please follow the “unsubscribe” instructions provided in such e-mails. To opt-out of other marketing communications please contact us using the contact information set out below.

We may also process your personal information if necessary for the provision of Services to you, to comply with our legal and regulatory obligations, and for the purpose of our legitimate interest or those of any third party recipient that receives your personal information, provided that such interests are not overridden by your interest or rights. In addition, the processing of your personal information may be based on your consent where we have expressly requested and received your consent.

Who Is Responsible For Your Personal Information

TradeZero and its affiliates (including TradeZero Canada Securities ULC, TradeZero America Inc., Trade Zero USA Inc., TZ Clear LLC, TradeZero Technology Limited, and TradeZero UK Ltd) are responsible for the personal information that we collect about you. Your personal information will be controlled by the TradeZero entity providing Services to you and, in some instances, your personal information may be controlled by more than one TradeZero entity.

We retain your personal information in an identifiable form in accordance with our internal policies which establish procedures for the retention, handling, and disposition of your personal information. Personal information is retained for a period of 5 years or as long as necessary to meet legal, regulatory, and business requirements or as to preserve in connection with litigation, investigations, or proceedings.

Who We Share Your Personal Information With

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law.

We Share Your Personal Information With The Following Third Parties:

- Your authorized agents and representatives or others to whom you instructor authorize us to disclose your information and data;
- TradeZero's lawyers, auditors, accountants and others who provide advice to TradeZero;
- TradeZero's global affiliates who may provide services to you or help TradeZero provide Services to you by, for example, engaging in customer support, sending communications, transaction processing, operational and regulatory functions;
- Non-affiliated companies where such disclosure is reasonably intended for the purpose of effecting, managing, or reporting transactions in connection with the provision of Services to you or establishing a relationship with you with a view to such transactions, for example, transaction processing, sending communications or providing clearing or custodial services;
- Vendors who assist TradeZero and/or its affiliates with fulfilling its legal and regulatory obligations including those in the areas of KYC, fraud, and crime prevention;
- Regulators and law enforcement authorities as permitted or required by law or regulation;
- Any person or entity to whom TradeZero and/or its affiliates is obliged by applicable law or regulation to disclose your data; and
- Any other party where we have first obtained your prior consent.

We May Provide Your Information To Third Parties, Including Marketing Companies, For The Purpose Of:

- Providing Services to you, subject to the terms described within this Privacy Policy;
- Sending you marketing communications that we believe may be of interest to you;
- Conducting research and development and improving Site and Application performance and personalizing your experience with our Services, including communicating with you and presenting content, products, and services tailored to you;
- Performing analytics concerning your use of our Services including your responses to our e-mails and the pages and advertisements you view while using the Sites or Applications; and
- Any other purpose that we disclose at the time you provide, or when we collect, your information.

Other Situations In Which Sharing Personal Information May Occur, Include:

- We may transfer personal information to a third party in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of any or all of our or our affiliates' business, assets, or equity, and during negotiations for the same.
- We may aggregate your personal information in a manner that no longer reveals your specific identity. We may use and disclose aggregated information for any purpose.
- We may also use and disclose, for any purpose, information that does not reveal your specific identity or directly relate to you as an identifiable individual, including the information described under "Information Collected Automatically," below. If, however, we are required to treat such information as personal information under applicable law, then we may use and disclose it for the purposes for which we use and disclose personal information, as detailed in this Privacy Policy.

We will require any entity to whom we disclose your information or who may obtain it on our behalf to ensure its confidentiality and to handle it in line with the legitimate purpose for which they are allowed to access it and in accordance with applicable data protection laws.

We will not share or sell your information with third parties for their own independent marketing or business purposes without your consent.

Transferring Personal Information outside of the European Economic Area

We may transfer your personal information outside of the EEA for the permitted purposes described in this Privacy Policy. This may include countries that do not provide the same level of protection as offered in the EEA. Any such transfers shall be made subject to appropriate safeguards to the extent required by relevant data protection laws or regulations.

Personal Information That You Provide Us

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that personal information to us for processing as described in this Privacy Policy.

Access And Choice

We may offer features through the Services that enable you to correct, update, amend or delete your personal information. You may also e-mail customer support (see the “Contact Us” section below), and we will comply with such a request to the extent required by law. We strongly encourage you to check the personal information you have with us to make sure it is accurate so that we can better serve you. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

If you decide at any time that you no longer wish to receive marketing e-mails from us, please follow the “unsubscribe” instructions provided in such e-mails. To opt-out of other marketing communications please contact us using the contact information set out below. Please note that TradeZero customers cannot opt out of administrative e-mails, such as regulatory, billing or service notifications.

Keeping Personal Information Secure

We take appropriate technical and organizational measures to keep your personal information confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to personal information. We seek to limit access to your personal information to authorized employees, agents, contractors, or vendors. No data transmission or storage system can, however, be guaranteed to be fully secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

Other Important Information

- **Your Rights** – The European Union General Data Protection Regulation and other local data protection laws provide you with certain legal rights regarding the personal information that we hold about you. These include:
 - Obtaining information regarding the processing of your personal information and access to the personal information we hold about you. Please note that there may be times where we are entitled to refuse requests for access to copies of personal information (in particular, information that is subject to legal professional privilege);
 - Requesting that we correct your personal information if it is inaccurate or incomplete;
 - Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where we are legally required or entitled to retain it regardless of your request;
 - Objecting to and requesting that we restrict our processing of your personal information in certain circumstances. Please note that there may be circumstances where we are legally required or entitled to refuse that request; and
 - Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

- *Data Protection Officer* – We have designated a Data Protection Officer (“DPO”) to promote compliance with privacy and data protection principles. If you wish to exercise any of your rights above, please contact the DPO at compliance@tradezero.nl. We will acknowledge your request and respond to you within one month. Please note that we may request that you prove your identity for us to comply with our security obligations and to prevent unauthorized disclosure of data. We also reserve the right to charge you a reasonable administrative fee for any unfounded or excessive requests concerning your access to your data and for any additional copies of the personal information you request from us.
- *Requests or Complaints* – We will consider any requests or complaints that we receive and provide you with a response in a timely manner. Complaints should be sent to support@tradezero.nl. If you are not satisfied with our response, you may contact the Dutch Data Protection Authority (Autoriteit Persoongegevens) (the “AP”). The AP can be contacted at (+31) -(0)70-888-8500 or <https://autoriteitpersoonsgegevens.nl/>.
- *Social Media and Links to Other Web Sites and Apps* - This Privacy Policy applies only to our Services. However, the Sites and Applications may contain links to other websites and apps that are not operated or controlled by TradeZero and for which we are not responsible. You should review the privacy policies of third-party websites and apps before using them.
- *Use of Email* - We keep our costs, and your costs, down by using email to communicate with you. For example, we may use email to notify you regarding your trading activity, of activity in your account, or of new features, products or services that may affect the way you may be able to use our Services.

Messages sent to us through the Contact Us pages on our Sites are secured with the same technology we use for account information. We cannot guarantee the security of messages you send directly to us addressed to our various email domains.

- *Access to Your Information* - If you wish to review your personal information that we have on file, please contact us (see the “Contact Us” section below). We will review any information that you notify us is incorrect. If we agree, we will correct our records. However, if we do not agree, you may submit a statement of dispute, which we will include in future disclosures of the disputed information. WE SHALL NOT MAKE AVAILABLE TO YOU, ANY INFORMATION COLLECTED IN CONNECTION WITH, OR IN ANTICIPATION OF, ANY CLAIM, ARBITRATION, OR LEGAL PROCEEDING UNLESS WE DETERMINE TO DO SO IN OUR SOLE DISCRETION. See also “Changes to this Privacy Policy” below.

Changes To This Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices or legal requirements. The effective date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy through our Services. Your use of our Services following these changes means that you accept the revised Privacy Policy. To stay informed of our privacy practices, we recommend you review the Privacy Policy on a regular basis.

Contact Us

If you have any questions or concerns about our Privacy Policy, please contact us at compliance@tradezero.nl