

Privacy Policy

PRIVACY POLICY for <https://www.tradetech-group.com/>

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This Privacy Policy is effective from 6th July 2020. We may change this Privacy Policy at any time, and if we do so will post the changes to this page as well as the date that the changes take effect.

We at TradeTech Group, care deeply about privacy, security, and online safety, all of which are a significant part of the TradeTech Group mission: to protect users of our products and services from the risks of theft, disruption, and unauthorised access to their online information and activities. This Privacy Policy is designed to inform you about how we collect, use, and share your personal data through our website or when you interact with us.

This Privacy Policy below sets out in detail how we process your personal data, and we encourage and recommend that you read it in full. We understand that people have busy lives though, and so wanted to help you by providing a brief overview of how and why we process your personal data.

1. Introduction

1.1. This Privacy Policy sets out the way in which TradeTech Group ("**we**" or "**us**"), a company incorporated and registered in the isle of Man, collects and processes Personal Information (as defined in paragraph 2.1 below). If you have any questions about this Privacy Policy or the processing of your Personal Information, please contact us at privacy@tradetech-group.com

1.2. We operate the website under the TradeTech Group companies banner. We will share your Personal Information in accordance with this Privacy Policy.

1.3. By using our website, you acknowledge TradeTech Group (and any companies in our Group) will process your Personal Information in accordance with this Privacy Policy, including for the purposes set out in paragraph 5 below. If you do not wish to provide your Personal Information on the basis set out in this Privacy Policy, you should not enter the relevant information on the website forms, or otherwise provide us with any of your Personal Information. However, if you do not provide your Personal Information, we may not be able to provide support regarding your queries.

1.4. Capitalised terms are defined in this Privacy Policy

2. The information we collect

2.1. As part of operating the Website, we collect your Personal Information. "**Personal Information**" means any information from which you can be personally identified, including your name, email address, home or business address and telephone number. Please see paragraph 5 for exhaustive list of personal data collected.

2.2. We collect Personal Information which you provide to us, including when you register interest and information you provide in communications with us. In addition, we collect information about your use of the website. We will also collect other information necessary for us to process your Personal Information for the purposes set out in this Privacy Policy.

3. Information we collect through Cookies and similar technologies

3.1 We collect information through "Cookies" and other similar technologies (e.g. pixel tags or links). This helps us to remember you when you visit the Website, and to improve your experience.

3.2 We also use information collected through "Cookies" and other similar technologies to detect any abuse of our Website and Services, and to help verify your age upon entry of site.

3.3 To find out more about "Cookies" and similar technologies please see paragraph 13 of this Privacy Policy. More information about the purposes of the "Cookies" and what is collected and how we use the data, this can be found in **paragraph 13.5**.

4. Information collected from third parties and how we use it

We do not use information from any third-party service providers.

5. How we use your Personal Information

5.1. In accordance with data protection laws, we will only process your Personal Information where we have a lawful basis for doing so. In respect of your Personal Information, these bases are:

- I. Via the Contact us form, if you have a complaint (account issues withdrawal issues) or any other concern, we will collect: **Full name, email address, contact number and content of any message you send**

5.2. The following are a list of the "Purposes" for which we (including any of our agents, Group members, sub-contractors and/or employees) process your Personal Information, and the lawful basis on which we carry out such processing:

Purpose	Retention period	Lawful Basis	Geographic locations where data is used Internally
Enquiry Forms: Interest in forming an agreement with TradeTech Group	1 year from form submission, if you are unsuccessful, then deleted from our environment	Consent	UK, EU, Israel
Enquiry Forms: Where we will manage your complaint / enquiry	1 year from when you notify us you no longer wish to be updated on promos / services, then deleted from our environment	Consent	UK, EU, Israel

6. Disclosure of your Personal Information

6.1. We may, for the identified stated purposes, disclose your Personal Information to any of the following recipients:

6.1.1. any company within our Group (including to its employees and sub-contractors) which assists TradeTech Group in fulfilling the stated purposes or which otherwise has a need to know such information.

6.1.2. any third party which assists TradeTech Group in fulfilling the stated purposes, including (but not limited to) providing support through Human Resources, Commercial team, Compliance team or our Information Security team

6.1.7. any law enforcement body which may have any reasonable need to access your Personal Information.

6.1.8. any regulatory body or authorised entity (e.g. a law enforcement agency) which may have any reasonable requirement to access your Personal Information; and

6.1.9. any potential purchaser of our business or any investors in it or in any company within our Group (including in the event of insolvency).

6.2. If at any time you wish us to stop processing your Personal Information for the above Purposes (stated in paragraph 5), you should contact us and we will take the appropriate steps to stop doing so, if there are no regulatory requirements. Please contact privacy@tradetech-group.com

7. Marketing Preferences

7.1. TradeTech Group or any company within TradeTech Group will not send you unsolicited information regarding any third party's products or services.

8. Transfer of your Personal Information outside of the EEA

Your Personal Information will be transferred outside of the European Economic Area, both to us and other members of our Group. This includes, but is not limited to, Isle of Man, UK. Please refer to Paragraph 5 for the explicit list of all geographic locations, associated with the purposes. Where we transfer your personal data outside of the EEA, we will put in place adequate measures to ensure that your Personal Information is kept secure (and such adequate measures shall include: (i) transferring to a jurisdiction which the European Commission recognises as providing adequate protection for the rights and freedoms of data subjects in connection with the processing of their personal data; and (ii) transfers pursuant to standard contractual clauses in accordance with European Commission decisions on transferring personal data).

9. Updating your Personal Information

You may request an update or deletion of your Personal Information at any time via the relevant contact page or privacy@tradetech-group.com

10. Your rights

10.1. You have the following rights in relation to your Personal Information:

10.1.1. a right to access your Personal Information as held by us (also known as a subject access request);

10.1.2. a right to receive certain Personal Information in machine-readable format;

10.1.3. a right to object to processing where the lawful basis is that it is in our legitimate interests, but please note that we may still process your Personal Information where there are other relevant lawful bases or where we have compelling grounds to continue processing your Personal Information in our interests which are not overridden by your rights, interests or freedoms;

10.1.4. a right to have inaccurate Personal Information rectified;

10.1.5. a right to have certain Personal Information erased where it is no longer necessary for us to process it, where you have withdrawn your consent pursuant to paragraph 10.1.8, where you have objected pursuant to paragraph 10.1.3, where your Personal Information has been unlawfully processed, or where erasing your Personal Information is required in accordance with a legal obligation;

10.1.6. a right to request an explanation of the logic involved where we make decisions about you solely through automated means;

10.1.7. a right to complain to the Information Commissioners Office; <https://ico.org.uk/global/contact-us/>, if you have any complaints regarding Data Protection.

10.1.8. where we have specifically requested your consent to process your Personal Information and have no other lawful conditions to rely on, you have the right to withdraw this consent; and

10.1.9. a right to object to direct marketing, which can be done by opting out of direct marketing via the communication itself. You also have a right to object to any profiling to the extent that it relates to direct marketing only.

10.2. If you are unsure about your rights or are concerned about how your Personal Information may be processed, you should contact your national data protection regulator.

10.3. If you would like to exercise any of your rights, then you can do so by contacting us as described below. Please be aware that while we will try to accommodate any request you make in respect of your rights; they are not absolute rights. This means that we may have to refuse your request or may only be able to comply with it in part.

10.4. Where you make a request in respect of your rights, we will require proof of identification. We may also ask that you clarify your request. We will aim to respond to any request within one month of verifying your identity. If we receive repeated requests or have reason to believe requests are being made unreasonably, we reserve the right not to respond.

11. Retention of your Personal Information

We will retain your Personal Information for the period necessary for us to provide you with our Services and to comply with our legal and regulatory responsibilities. Accordingly, please refer to paragraph 5 for the retention periods. Where it is no longer necessary for us to process your Personal Information, we will delete it sooner as stated in section 5.2.

12. Contacting us

12.1. If at any time you believe that we have not adhered to this Privacy Policy, please contact our privacy team at privacy@tradetech-group.com

13. Advertising and our use of Cookies

13.1. We may collect anonymous information about your use of the Website using "cookies", pixel tags and similar functionality. A "cookie" is a small file of text which is downloaded onto your computer when you access the Website, and it allows us to recognise when you come back to the Website. We use cookies for the operation of this website. For these purposes, Cookies are placed on your device to identify you in the future when you visit our website or connect with any of our applications.

The cookies used on this Website are either set by us or by our third-party service providers, and fall into the following categories:

1) Strictly Necessary - these cookies are essential in order to enable you to move around the Website and use its features. If you remove or disable these Cookies, we cannot guarantee that you will be able to use our Websites or benefit from all our security features.

2) Performance - these Cookies collect information about how visitors use our Website. They allow us to recognise and count the number of visitors and to see how visitors move around our Website.

3) Functionality - these Cookies are used to provide services or to remember choices you make so we can personalise our content for you. We use this information to customise your experience of our Website to meet your preferences for content layout, text size etc. You can manage these Cookies using your browser settings. However, if you block them we may not be able to offer you certain services that you have chosen

4) Targeting - these Cookies record the fact that you have visited our Website, including which web pages you have accessed, which device you have accessed them from, and which links you have followed. We use this information to make our Website relevant to your interests and for fraud and website abuse detection purposes, including detecting players who have abused bonus schemes or other promotions.

Some of these are "session cookies", which stay in place only for the duration of your visit to our website and are deleted at the end of your browsing session. Others are "persistent cookies", which remain on your device for a period of time after you have left the Website. See 13.5 for retention periods of each cookie.

13.2. Most browsers have cookies enabled by default, but you are able to change your cookies settings, which are usually found in the 'options' or 'preferences' menu of your internet browser. You can block any cookies from any website by activating the setting on your browser that allows you to refuse the setting of some or all cookies. However, if you block all cookies you may not be able to access all or part of our Website. You can also use your browser settings to delete cookies. For more information about how to disable cookies in your browser please visit www.allaboutcookies.org.

13.3. As part of the Website's operation, our Website automatically logs internet IP addresses. We do NOT log any e-mail address of visitors to the Website.

13.4. While the Website may contain links to websites operated by parties other than us, we are not responsible for the privacy practices or content of such websites.

Please review the Cookies in use and their purposes in the below table:

13.5 Cookies Purposes:

Cookie	Description	Duration	Type	Geographic Location
super_session	Keeps the status of the visitor’s session through different page requests	Session	Strictly Necessary	
visid_incap_1172522	Third party (Incapsula) security tools cookie	1 year	Strictly Necessary	
incap_ses_247_1172522	Third party (Incapsula) security tools cookie	session	Strictly Necessary	
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site’s analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	2 years	Analytics	
_gid __utmvc	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.	1 day	Analytics	
_gat_gtag_UA_157809907_1	Google uses this cookie to distinguish users.	1 minute	Analytics	

14. Security

14.1. We are committed to ensuring that your Personal Information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the Personal Information that we collect.

14.2. All the Personal Information that you provide us is stored in a secure computing environment protected by secure firewalls to prevent unauthorized access. We control access so that only people who need to access the Personal Information can. All staff are provided security training and are required to adhere to a comprehensive set of security policies, procedures, and standards related to their jobs.

14.3. When you access any area of our Website, we use encryption in line with industry standards. This means that all the information sent between your computer and our server architecture is encrypted so that no one can read it in transit.

14.4. Where your Personal Information needs to be disclosed to our service providers, we require them to process and protect your Personal Information in a manner consistent with this Privacy Policy and applicable laws.

15. Testing

Occasionally, we may share limited personal data to test a new third-party service or new software providers, to improve our capabilities to adhere regulatory requirements. Any personal data shared will be fully restricted for the purpose of testing of services, new software, new third-party providers capabilities. This is a mandatory aspect of continuous improvement of services we offer to players and clients.

Any data shared to conduct these tests will be deleted promptly at the end of the testing period.