



**ARUM TRADE**

PRIVACY POLICY AND DATA PROCESSING

PUBLIC

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Owner(s):	ARUM TRADE LIMITED
Contact Person:	<a href="mailto:support@arumtrade.com">support@arumtrade.com</a>
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## Introduction

Arum Trade Ltd (hereinafter the “**Company**”) is a Vanuatu Investment Firm, incorporated and registered under the laws of the Republic of Vanuatu, with registration No. 40490. The Company is authorized and regulated by the Vanuatu Financial Services Commission (“**VFSC**”) with Dealing in Securities Principal's License.

This Policy is made in accordance with the Dealers In Securities (Licensing) Act [CAP 70] (as Amendment) as from time to time amended and all relevant secondary legislation, the Data Protection Act 1998, as amended and General Data Protection Regulation (EU) 2016/679.

This Policy explains how the Company uses the information and personal data collected from its clients. It is very important to read this Policy so that the clients are fully aware of personal data processing and data protection principals. The Company is the controller and responsible for your personal data. For all data matters contact our Data Protection Officer at [support@arumtrade.com](mailto:support@arumtrade.com).

**Note:** The English version of this policy is the governing version and shall prevail whenever there is any discrepancy between the English version and other versions.

## The collection of personal information

The Company collects the necessary information and data including name, photo, email address, contact details, address, bank details, economic profile and other required personal data from its clients

- to identify clients and verify collected data and documents, carry out due diligence and KYC, including screening and checking in third-party sources and to construct their economic profile (incl. demographic information, background checking);
- to understand the needs/risk appetite of clients, their background and their appropriateness and suitability;
- to communicate with clients;
- to open a client's trading account;
- to perform client's transactions, collect and assess trading related information;
- to safeguard the clients' assets and privacy;
- to provide clients with the services they require;
- to fulfill its statutory obligations on compliance and regulatory reporting;

- to improve the services, customize browsing experience and inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes.

In this respect, the Company may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients' profile based on their requirements and preferences in order to provide its services effectively.

### **Usage of personal information**

If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following address [support@arumtrade.com](mailto:support@arumtrade.com). Alternatively, the clients may click "**Unsubscribe**" at the footer on the email they received and the delivery of information shall be terminated.

If for any reason the client doesn't agree with the Company's updated Privacy Policy and would like to close his/her account, the client can do so by logging in to the account, deleting his/her profile.

The GDPR includes **the following rights for the Clients**: the right to be informed; the right of access; the right to rectification; the right to erasure; the right to restrict processing; the right to data portability; the right to object; the right not to be subject to automated decision-making including profiling. In respect of the Client's rights the Company informs you that you are **able to exercise** the above-mentioned rights if this does not contradict the legal requirements in relation to the Prevention of Money Laundering and Terrorist Financing Laws, Record Keeping obligations of the Company etc.

### **Protection of personal information**

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

The Company has adequate security measures to protect client's personal data from being used or accessed in an unauthorized way, lost, disclosed, stolen. The Company uses appropriate technical measures strictly following confidentiality principles. All personal data is collected, stored, recorded, used and kept according to the Company's Data and Security Policy and regulatory requirements. The Company limits access to the client's data within the Company. Only relevant client's data is processed by designated employees according to their functionality, in relation to the purposes for which they are required.

### **Affiliates and Partners**

The Company may share information with affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.

### **Non-affiliated third parties**

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Policy.

The Company reserves the right to disclose personal information to third parties where required by Law, regulatory and other government authority. The Company may also disclose information as necessary to credit or regulatory reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

### **Contact Clients**

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company's contract for differences trading. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

### **Restriction of responsibility**

The Company is not responsible for the privacy policies or the content of sites to which links [www.arumtrade.com](http://www.arumtrade.com) has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

### **Use of "COOKIES"**

Cookies are small text files that are stored on your computer by a website you visit in order to enable you to perform certain functions on the website and regulate its content to your preference. They can store data on pages which you have provided key information for (e.g. when you provide a password) but only once you are asked and you accept to the storage of this information. Cookies may be used on some pages of the site for us to provide website users with a more customized web browsing experience; they are not used to determine the personal identity of anyone merely visiting the site.

The Company uses cookies to secure clients' trading activities and to enhance the performance of the website [www.arumtrade.com](http://www.arumtrade.com). Cookies used by the Company do not contain personal information or other sensitive information.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the website [www.arumtrade.com](http://www.arumtrade.com), the Company may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behavior and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Arumtrade.com cookies types

### **Session cookies**

These cookies are temporary cookies as they are deleted as soon as you close your browser. Session cookies are used to retain the information you provide us with as you navigate through each section of our website.

You can choose to decline session cookies via your browser's privacy settings but please note that this may have a negative impact on your browsing experience and particularly if these are declined across all websites.

### **Analytical cookies**

Analytical cookies may include both temporary and more persistent cookies that we use to track how you use our website and for how long. Analytical cookies do not divulge any identifying information specific to your person but they do help us improve how we provide you with our content.

Refer to your browser's privacy settings on how you can opt-out of analytical cookies.

### **Functional cookies**

Functional cookies record and save your choices in order to provide for a more seamless experience across our website. One-way functional cookies do this is by remembering your language selection each time you visit us.

Refer to your browser's urgent privacy settings on how you can opt-out of functional cookies.

### **Third Party cookies**

These cookies are used by third parties and mostly by social media websites like Facebook, Google+, LinkedIn, Twitter, YouTube or Live chat. Third Party cookies allow us to offer you easy ways to share our content throughout your social media and also present you with the videos we post on YouTube.

Clients can disable the use of these cookies through their browser's privacy settings but this will also disable all the functions described above.

Clients may find more information about the individual cookies we use and the purpose for which we use them, in the table attached below.

## **Updates**

The Company will perform a periodical review of this Policy, at least once a year. The Policy is in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this Document.

The Company encourages its clients to periodically review this Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

**The Policy must be read together with the Client Agreement of the Company which is published on the Company website [www.arumtrade.com](http://www.arumtrade.com) .**