

# Privacy Policy

## Data Privacy Notice for clients and website users

**Last updated: 18 December 2018**

Copy Trade Platinum Limited ('we'/'us'/'our') (registered number 11649376) understands the importance of keeping your data safe and appreciates your trust in us to do that carefully. This notice describes our Privacy Policy and forms part of our website terms and conditions ('Website Conditions').

This Privacy Policy explains how we may collect personal data about you on the Website. It also explains some of the security measures we take to protect your personal data and tells you certain things we will do and not do. You should read this Privacy Policy in conjunction with the Website Conditions.

By accepting our Website Conditions or by visiting [www.copytradeplatinum.com](http://www.copytradeplatinum.com) ('the Website') you are accepting and consenting to the practices described in this Privacy Policy.

When we first obtain personal data from you, or when you subscribe to our services, we will give you the opportunity to 'opt-out' of marketing campaigns and promotional offers. An 'opt-out' option means you do not wish us to send you information about other services or products (as applicable). You can do this by ticking a box on the subscription form. You may change your mind at any time by emailing us at the address below or unsubscribing to the emails.

### 1. The personal data we collect from you includes but is not limited to the following:

- 1.1 When you visit the Website, we will collect data in connection with your use of the internet.
- 1.2 When you enquire about or subscribe to our services, we will request personal data such as your name, username and your email address.
- 1.3 When you subscribe to our services, we will monitor your location data.
- 1.4 Any credit or debit card information you provide to subscribe to our services is collected and processed directly by our payment processors such as Stripe Inc or PayPal. You can view the privacy policies here <https://stripe.com/gb/privacy> and [www.paypal.com/en/webapps/mpp/ua/privacy-full](http://www.paypal.com/en/webapps/mpp/ua/privacy-full).

### 2. Reasons for collecting your data

- 2.1 In compliance with GDPR Article 6 ("processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"), we will use the personal data for purposes that include but are not limited to:

- 2.1.1 processing any enquiries you have about our services;

- 2.1.2 verifying your identity when you use our services or contact us;
  - 2.1.3 delivering our services to you;
  - 2.1.4 analysing our services with the aim of improving them;
  - 2.1.5 notifying you about changes to the Website, services or Website Conditions or anything else we may be required or reasonably expected to notify you of; and
  - 2.1.6 ensuring the content on the Website is presented in the most effective manner for you and for your computer.
- 2.2 In compliance with GDPR Article 6 (“the data subject has given consent to the processing of his or her personal data for one or more specific purposes”), if you have given and not withdrawn consent we may use the personal data for these purposes:
- 2.2.1 providing you with information about our other services, offers or products that you may be interested in; and
  - 2.2.2 providing you with information about third-party services, offers or products that you may be interested in.
- 2.3 In compliance with GDPR Article 6 (“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”), we will use the personal data for purposes that include but are not limited to:
- 2.3.1 providing you with the best service and information about our services, and to review your ongoing needs;
  - 2.3.2 responding to your enquiries or requests and investigating or settling disputes;
  - 2.3.3 providing you with your subscription confirmation;
  - 2.3.4 identifying and preventing fraud; and
  - 2.3.5 determining the effectiveness of promotional campaigns and advertising.

### **3. Storing your data**

- 3.1 We take reasonable and appropriate measures to keep your personal data secure and to prevent it from being lost, used or accessed in an unauthorised way, altered or disclosed. All personal data will be stored on our computer system and external hard drive. Both storage systems will be password protected.
- 3.2 We will make reasonable efforts to ensure the data is accurate and up to date. We undertake to rectify any inaccuracies of which we become aware of without delay. All personal data we store is stored in the European Economic Area except as explained at clause 4.2.5.
- 3.3 We will only keep your data for as long as necessary and justified. We ensure that we only keep the minimum data needed for the purposes of performing the services to you, legitimate interests,

and in line with our legal obligations. For example, but not limited to dealing with complaints and audits.

3.4 Personal data will usually be retained for 12 months as necessary to fulfil the purposes we collected it for, after which time it is destroyed. In some circumstances, such as renewing a subscriptions package, we may retain your personal data for longer.

#### **4. Sharing our data**

4.1 We will not disclose your personal data to any third party except in accordance with this Privacy Policy.

4.2 We may allow other people and organisations to use personal data we hold about you in the following circumstances:

4.2.1 If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case personal data held by us, about our customers, will be one of the transferred assets.

4.2.2 If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.

4.2.3 We employ companies and individuals to perform functions on our behalf and we may disclose your personal data to these parties for the purposes of fulfilling our obligations to you. Those parties are bound by strict contractual provisions with us and only have access to personal data needed to perform their functions, and may not use it for other purposes.

4.2.4 If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We may also use technology to detect and prevent fraud.

4.2.5 In accordance with clause 1.4, we share your personal data with PayPal and Stripe. Stripe is outside the European Economic Area and is part of the Privacy Shield. This requires Stripe to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en).

#### **5. Cookies**

When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called 'cookies'.

These cookies cannot be used to identify you personally and are used to improve services for you, for example:

- Allowing you to navigate between pages efficiently.

- Enabling a service to recognise your computer so you don't have to give the same information during one task.
- Recognising that you have already given a username and password so you don't need to enter it for every web page requested.
- Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast.

To learn more about cookies, see:

[www.allaboutcookies.org](http://www.allaboutcookies.org)

[www.youronlinechoices.eu](http://www.youronlinechoices.eu)

[www.google.com/policies/technologies/cookies/](http://www.google.com/policies/technologies/cookies/)

Most browsers give the opportunity to amend your settings to accept all or some cookies, to notify you when a cookie is issued, or to not receive cookies at any time. The last of these options means that personalised services cannot be provided and you may not be able to take full advantage of all of a website's features. Refer to your browser's Help section for specific guidance on how you may delete cookies you wish to remove from your computer.

Multiple cookies may be found in a single file depending on which browser you use.

The cookies used on the Website have been categorised based on the categories found in the ICC UK Cookie guide, as follows:

*Category 1: strictly necessary cookies*

These cookies are essential in order to enable you to move around a website and use its features, such as accessing secure areas of the website. Without these cookies, services you have asked for, such as shopping baskets or e-billing, cannot be provided.

*Category 2: performance cookies*

These cookies collect information about how visitors use a website, for instance, which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

*Category 3: functionality cookies*

These cookies allow a website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. If you do not

allow these cookies, the performance and functionality of the site and your access to some of our services may be affected.

The list below shows the cookies that we use, other than those that are strictly necessary for this service. If you have any queries about these or would like more information, please contact us.

<b>Cookie name</b>	<b>Description</b>
_ga	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier.
_gid	It appears to store and update a unique value for each page visited.

By using the Website, you agree that we can place these types of cookies on your device.

## **6. Links**

6.1 The Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer personal data to these advertisers or third-party websites.

6.2 These third-party websites and advertisers, or internet advertising companies working on their behalf, sometimes use technology to send (or 'serve') the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about internet advertising companies (also called 'ad networks' or 'network advertisers'), including information about how to opt-out of their information collection.

6.3 We exclude all liability for loss that you may incur when using these third party websites.

## **7. Further Information**

7.1 If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Manager, Copy Trade Platinum Limited, 83 Ducie Street, Manchester, England, M1 2JQ, or email us at [copytradeplatinum@gmail.com](mailto:copytradeplatinum@gmail.com).

- 7.2 We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.
- 7.3 You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by emailing us at [copytradeplatinum@gmail.com](mailto:copytradeplatinum@gmail.com). This Privacy Policy applies to personal data we hold about individuals. It does not apply to information we hold about companies and other organisations.
- 7.4 If you would like access to the personal data that we hold about you, you can do this by emailing us at [copytradeplatinum@gmail.com](mailto:copytradeplatinum@gmail.com). There may be a nominal charge of £10 to cover administrative costs.

We aim to keep the personal data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate personal data about you, we will delete it or correct it promptly. Please email us at [copytradeplatinum@gmail.com](mailto:copytradeplatinum@gmail.com) or write to us at our registered address 83 Ducie Street, Manchester, England, M1 2JQ.