

Trade Software, Inc.

## Privacy Policy

Trade Software, Inc. Privacy Policy. At Trade Software, Inc. (“TSI”) we want you to know that we respect your privacy, the privacy of our Distributors and the privacy of our customers. This document provides information regarding our policy as it relates to the collection, use and disclosure of personal information. It also outlines our customer’s rights to limit the collection use or disclosure of personal information. Personal information may include your name, email, mailing and/or business address, phone numbers, or other information that identifies you personally. We at TSI hold this personal information seriously and we maintain this information in the strictest of confidence. We do not sell any information to any third party. We also maintain a secured web site on all pages that require you to provide any personal information. This policy applies to users of TSI’s services anywhere in the world.

The practices described in this policy are subject to applicable laws in the places in which we operate. This means that we only engage in the practices described in this policy in a particular country or region if permitted under the laws of those places. Please contact us if you have questions on our practices in your country or region.

### **Data Controller:**

TSI provides products to users throughout the world. If you use our products in any country, our data controller is:

MARCIO RODRIGO BUSTAMANTE

Questions, comments and complaints about TSI’s data practices can be submitted to TSI’s data protection office by emailing customer service at [customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com).

### **What information do we collect?**

TSI collects information on the Site at two different stages. First, we collect anonymous aggregate information (such as a domain name or IP address) from all visitors to the Site. This type of information is never linked to any personally identifiable information and is only used in the aggregate to generate statistical reports about the use of the Site.

Second, we require the submission of certain personally identifiable information when you use the services available for the site. We collect information from you when you register on our site or place an order or fill out a form. When ordering or registering on our site, as appropriate, you may be asked to enter your: name, e-mail address, mailing address, phone number, ID number, and crypto wallet. You may, however, visit our site anonymously.

Like most websites, we use cookies and/or web beacons to enhance your experience, gather general visitor information, and track visits to our website. Please refer to the ‘do we use cookies?’ section below

for information about cookies and how we use them.

### **What do we use your information for?**

TSI collects a variety of information for many different purposes that are related to the use and sale of our products. These purposes include product interest and purchasing trends, payment information, contact information, usage information as it relates to our products, and service requirements. We do this to develop a good understanding of your needs, analyze those needs and respond to those needs. This is done to identify products and services offered by our company, distributors or by other companies that we believe could be of interest to you. When doing so, we may offer these products or services to you for your purchasing consideration.

Further to the above, any of the information we collect from you may be used in one of the following ways:

- To personalize your experience (your information helps us to better respond to your individual needs)
- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends
- Verify your identity
- To process transactions. Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested
- To administer a contest, promotion, survey or other site feature
- To send periodic emails. The email address you provide for order processing, may be used to send you information and updates pertaining to your order, in addition to receiving occasional company news, updates, related product or service information, etc.
- Legal proceedings and requirements. We may use the information we collect to investigate or address claims or disputes relating to your use of TSI's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

*Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.*

### **How do we protect your information?**

We implement a variety of security measures to maintain the safety of your personal information when you place an order or access your personal information. Protecting the security of your personal information is very important to us.

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

If you register with us, your online account information is protected by a password chosen by you. Access to that online account requires your username and password. We recommend that you do not disclose your username and password to any other person. To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect online. We use the latest in encryption technology when collecting or transferring sensitive data.

When registering for access to a secure area of the Site, we will ask you to select a username and password. We recommend that you do not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or in an unsolicited email. Also, remember to sign out of the registered site and close your browser window when you have finished your work. This is to ensure that others cannot access your personal information and correspondence when accessing your computer.

#### **Do we use cookies?**

Yes (Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information.

We use cookies to authenticate users, help us remember and process the items in your shopping cart, understand and save your preferences for future visits, keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

#### **Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses. Further to this, we may use customer identifiable information to investigate and help prevent potentially unlawful activity or if required by subpoena, search warrant, or other legal process. We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our

site and use our services, as well as when you visit other online sites and services.

### **Third party links:**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Disclosure of Personal Information:**

Some of TSI's services and features require that we share information with other users or at your request. We may also share your information with our affiliates, subsidiaries and business partners, for legal reasons or in connection with claims or disputes.

1. As required by law. We will disclose personal information when required by law or if we have a good faith belief that such action is necessary to (a) comply with a current judicial proceeding, a court order or legal process served on us, (b) protect and defend our rights, or (c) protect the rights, property, and other interests of our users or others.
2. At your request. We may share information to others, per your request.
3. With general public when you submit content to a public forum. When you communicate with us through the internet via blogs, social media etc., your communications may be viewable by the public.
4. With Subsidiaries and Distributors. We share information with our subsidiaries and distributors to help us provide our services or conduct data processing on our behalf.
5. With Service providers and business partners. TSI may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners.
6. With your consent. TSI may share your information other than as described in this policy if we notify you and you consent to the sharing.

### **Information Retention and Deletion:**

TSI retains user profile and other information for as long as you maintain your TSI account.

TSI retains transaction, location, usage and other information for 7 years in connection with regulatory, tax, insurance or other requirements in the places in which it operates. TSI thereafter deletes or anonymizes such information in accordance with applicable laws.

Users may request deletion of their accounts at any time. Following such request, TSI deletes the infor-

mation that it is not required to retain, and restricts access to or use of any information it is required to retain. You may request deletion of your account at any time by email directly to customer services at [customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com). Following such request, TSI deletes the information that it is not required to retain. In certain circumstances, TSI may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, TSI will delete your account as described above.

TSI may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if TSI shuts down a user's account because of unsafe behavior or security incidents, TSI may retain certain information about that account to prevent that user from opening a new TSI account in the future.

### **Business Transfers:**

In the event TSI goes through a business transition or transfer, our users' personal information may be part of the assets transferred. You acknowledge that such transfers may occur, and that any acquirer of TSI or its assets may continue to use your personal information as set forth in this Privacy Policy.

### **Special Information for EU Users:**

Beginning May 25, 2018, the processing of personal data of users in the European Union is subject to the EU General Data Protection Regulation ("GDPR").

This section summarizes TSI's grounds for processing personal information under the GDPR, and the rights of EU users as relates to TSI's handling of personal information.

#### **1. EU User Rights**

If you are a TSI user in the EU, you have the following rights with respect to TSI's handling of your personal information. To exercise these rights, please see below or submit your request by email directly to customer services at [customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com).

Users outside the EU may also request explanation, correction, deletion or copies of their personal data by email directly to customer services at [customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com).

##### **a. Explanation and copies of your data**

- You have the right to request an explanation of the information that TSI has about you and how TSI uses that information.
- You also have the right to receive a copy of the information that TSI collects about you if collected on the basis of consent or because TSI requires the information to provide the services that you request.

##### **b. Correction**

- If TSI has information about you that you believe is inaccurate, you have the right to request correction of your information. Please see the section titled “Explanation, Copies and Correction” below for more information on correcting, or requesting correction of, your information.

#### c. Deletion

- Users may request deletion of their accounts at any time. Users may request deletion by email directly to customer services at [customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com). We may retain certain information about you as required by law and for legitimate business purposes permitted by law.
- Please see the “Information Retention & Deletion” section above for more information regarding TSI’s retention and deletion practices.

#### d. Objections and complaints

- Users in the EU have the right to object to TSI’s processing of personal data, including for marketing purposes based on profiling and/or automated decision making. TSI may continue to process your information notwithstanding the objection to the extent permitted under GDPR.
- You may submit questions, comments or complaints to TSI’s Data Protection Officer.

## 2. Grounds for Processing

The GDPR requires that companies processing the personal data of EU users do so on the basis of specific legal grounds. As described below, TSI processes the information of EU users based on one or more of the grounds specified under the GDPR:

#### a. The processing is necessary to provide the services and features you request

- TSI must collect and use certain information in order to provide its services. This includes:
  - User profile information that is necessary to establish and maintain your account, including to verify your identity; enable communications for your orders and accounts; and to enable you to make payments or receive earnings.
  - Transaction information, which is necessary to generate and maintain in connection with your use of TSI’s services.

#### b. The processing is necessary to protect the vital interests of our users or of others

- TSI may process personal information, including disclosing data with law enforcement authorities in case of threats to the safety of users or of others.

#### c. The processing is necessary for TSI’s legitimate interests

- TSI collects and uses personal information to the extent necessary for its legitimate interests. This includes collecting and using information:
  - To maintain and enhance our users’ safety and security.

- To prevent, detect and combat fraud in connection with the use of our services.
- To inform law enforcement officials regarding criminal acts or threats to public safety.
- To provide customer support.
- To optimize our service and develop new services.
- For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience and enhance the safety and security of our services.
- For direct marketing purposes. This includes, for example, analyzing data to identify trends and tailor marketing messages to user needs.
- To enforce TSI's Terms of Use.

d. The processing is necessary for the legitimate interests of other persons or parties

- TSI collects and uses personal information to the extent necessary for the interests of other persons or the general public. This includes sharing information in connection with legal or insurance claims, to protect the rights and safety of others.
- TSI may also process personal information when necessary in regards to a substantial public interest, on the basis of applicable laws.

e. The processing is necessary to fulfill TSI's legal obligations

- TSI is subject to legal requirements in the jurisdictions in which it operates that require us to collect, process, disclose and retain your personal data.
- TSI may also share information with law enforcement, or requests by third parties pursuant to legal processes.

#### f. Consent

- TSI may collect and use your information on the basis of your consent. You may revoke your consent at any time. If you revoke your consent, you will not be able to use any service or feature that requires collection or use of the information we collected or used on the basis of consent.
- TSI relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you.
- Please see the Choice & Transparency section below for further information about these data collections and uses, how to opt in or out of them, and the effect of opting out of these on your use of TSI's apps.
- TSI may also collect personal information about you through voluntary surveys. Your responses to such surveys are collected on the basis of consent, and will be deleted once no longer necessary for the purposes collected.

#### **Choice and Transparency:**

TSI provides means for you to see and control the information that TSI collects.

You may also request that TSI provide you with explanation, copies or correction of your data.

## 1. Explanations, Copies and Correction

You may request that TSI:

- Provide a detailed explanation regarding the information TSI has collected about you and how it uses that information.
- Receive a copy of the information TSI has collected about you.
- Request correction of any inaccurate information that TSI has about you.
- You can make these requests by contacting TSI by email directly to customer services at [customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com).

## 2. Marketing Opt-Outs

You may opt out of receiving promotional emails from TSI here. You may also opt out of receiving emails and other messages from TSI by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages.

### Terms and Conditions:

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at [www.tradesoftware.com](http://www.tradesoftware.com).

### Your Consent:

By using our site, you consent to our web site privacy policy. If we decide to change our privacy policy, we will post those changes on this page.

### Policy Updates:

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.

### Contacting Us:

If there are any questions regarding this privacy policy you may contact us using the information below.  
The Trade Software, Inc. Team  
[customerservice@tradesoftware.com](mailto:customerservice@tradesoftware.com)