

## Privacy Policy

GULF BROKERS LTD, Registration No. 8417634-1, Reg. address: Room B11, First Floor, Providence Complex, Providence, Mahe Seychelles. PO BOX 6007 (hereinafter called the “Company”) and its website octrado.com respect your privacy. This privacy Policy provides the manner your data is collected and used by GULF BROKERS LTD and octrado.com. You are advised to read this Privacy Policy carefully.

This Privacy Policy describes the information, as part of the normal operation of our services, we collect from you and what may happen to that information.

### **Application**

Personal information/data is information relating to you, which can be used to personally identify you (either directly or indirectly). This Privacy Policy describes how we collect, use, and otherwise handle Personal Data that you provide or make available to us.

### **Collection of Information**

The company may collect and maintain:

- a) your name
- b) your email address
- c) your address
- d) your mobile telephone number
- e) data on your simulated trading performance
- f) data on your payment(s)
- g) data necessary for AML and KYC procedures
- h) cookies

The company collects this data mainly directly from you (through your registration – account opening procedure).

We also collect data about your transactions you undertake including details of payment cards used.

We collect documents needed for AML check.

You can edit some of your Personal Data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it’s inaccurate.

If you choose not to provide Personal Information requested by us, we may not be able to provide you with the information and/or services you have requested or otherwise fulfil the purpose for which we have asked for the Personal Information.

### **Use of Personal Data**

We use your Personal Data for the purpose it has been collected for.

If you agree, we may use and share your Personal Data with our partners who may send you or contact you with marketing and promotional information. The list of our partners is available on [octrado.com](https://octrado.com).

If we do not require your consent, processing your personal data is not for marketing purposes. Most likely we need your data for the performance of the contractual relationship with you. We also may process your data in order to comply with statutory obligations (e.g. anti-money laundering legislation, tax laws etc.) or for the purposes of our legitimate interests (eg. Legal issues and litigation).

### **Storage of Personal Data**

All information you provide to us via our website or otherwise is stored on our secure servers.

We will store your Personal Data for as long as reasonably necessary for the purposes for which it was collected, as explained in this Privacy Policy.

In some circumstances we may need to store your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, reporting, regulatory, tax, accounting requirements.

Where your information is no longer required, we will ensure it is disposed of in a safe manner.

In specific circumstances we may store your Personal Data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

### **Protection of your Personal Data**

To protect against the loss, misuse, and alteration of the information under our control, we have in place appropriate physical, electronic and managerial procedures. For example, our servers are accessible only to authorized personnel and that your information is shared with respective personnel on need-to-know basis to complete the transaction and to provide the services requested by you.

### **Your rights**

The following section explains your rights about your personal data:

- You have the right to be informed of any personal data which we may hold or process about you
- You have the right to request access to the personal data which we may hold or process about you
- You have the right to ask for a copy of the personal data we hold about you in the extend set forth by the applicable legislation
- You have the right to require us to correct any inaccuracies in your data free of charge
- You have the right to ask us to stop using your personal data for direct marketing purposes
- You have the right to ask us to delete your personal data or restrict the processing of your personal data
- You have the right to withdraw consent to the:
  - Processing of your personal data by us except where your personal data is required for business operation in relation to the product or service you obtain from us, and
  - Sharing your personal data with third parties for purposes such as, but not limited to marketing or sales

- You have the right to request us to transfer any personal data which we may hold to you or any other service provider of your choice.
- You have the right to lodge a complaint with the supervisory authority

We will ask you to verify your identity before allowing you to access your personal data.

If you have any concerns about your data, you can contact us via the contact form available on [octrado.com](https://octrado.com).

### **Privacy Policy changes**

This Privacy Policy may be subject to change from time to time. The current version of this Privacy Policy is posted online by GULF BROKERS LTD on [octrado.com](https://octrado.com) website.

You should check our Privacy Policy regularly. Your continued use of the [octrado.com](https://octrado.com) website and services constitutes your agreement to this Privacy Policy, as amended from time to time.