



PRIVACY POLICY

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Scope

Our Privacy Policy below describes in detail how CMTrading handles the collection, process management and protection of personal data of its existing and prospective clients.

Introduction

At CMTrading we acknowledge that confidentiality and security of your personal data is of utmost importance to you hence we have developed specific policies and practices designed to safeguard your personal data as we are committed to protecting and respecting your personal data. This Privacy Policy describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

Additionally, CMTrading will monitor, audit and document internal compliance with data protection policies and applicable statutory data protection requirements, including local data protection legislation. We are constantly working towards enhancing data protection practices within CMTrading such as assignment of responsibilities, raising awareness and training the staff involved in data processing operations.

This Privacy Policy is based on the privacy and data protection principles applicable to the countries in which we operate. This Privacy Policy will be reviewed and/or amended from time to time to include any new obligations or arrangements in the way we process your personal data as a means to ensure compliance with any applicable laws and regulations; hence it is important that you check this Policy for any updates. Any personal information we hold will be governed by the current Privacy Policy at the given time. You will be notified of any important amendments to this Policy.

Please note that this Policy is addressed to customers and potential customers. If you are a CMTrading employee, a contractor to CMTrading or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us.

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Any reference to 'us', 'our', 'we' or 'CMTrading' in this Privacy Policy is a reference to each group company within the CMTrading Group as the context requires unless otherwise stated.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this Privacy Policy is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

This Privacy Policy is addressed to legal and or physical persons who provide their personal data to CMTrading and/or visit and/or use CMTrading websites, trading platforms, software application, social media and/or any other electronic services ("Electronic Services").

We encourage you to read carefully this Privacy Policy together with any other privacy statement or fair processing notice we may provide you with on specific occasions in the process of collecting or processing your personal data. It is important that you read this Privacy Policy so that you are fully aware of all logistics regarding your personal data. This Privacy Policy supplements any and all other notices that we may provide you with from time to time and is not intended to override them, by elaborating on how we collect, store, use, share and, in any other form, process your personal data and your rights during our business relationship and after its termination.

Who Are We?

This Privacy Policy applies to the processing activities of the following data controller entities within the CMTrading group of companies and their respective affiliates and providers, which include:

GCMT Limited trading as CMTrading, is a Securities Dealer registered in Seychelles with company registration number 8425982-1, and is licensed and regulated by the Financial Services Authority (FSA) of Seychelles with license number SD070. Registered office: Unit A, House of Francis, Ile Du Port, Mahe, Seychelles.

GCMT SOUTH AFRICA (PTY) LTD trading as CMTrading Registration No. 2013/045335/07, a juristic representative and agent of BLACKSTONE MARKETING SA (PTY) LTD Registration No. 2010/010099/07 (FSP No. 38782). Registered office: 14th Floor Sandton City Office Towers, 158 5th St, Sandton, 2196, South Africa.

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CMT Processing LTD. Registered Number HE 340325. Registered office: Triton Quarters, 2nd Floor, Office 202, Parallel Road to New Port Limassol, No.22, 3045 Limassol, Cyprus. All cards are processed by CMT Processing LTD. The company acts as internal and non-commercial payment processing agent.

GCMT GROUP LTD. with registration number 104785 and registered address at Suite 108, Premier Building, Victoria, Mahe, the Republic of Seychelles, is the holding company of all abovementioned entities, operating in the international capital markets since 2012 throughout the regulated units held hereto.

Your personal data will be controlled by the relevant entity of the CMTrading group of companies. that provides services to or is in electronic communication with you. In some instances, your personal data will be controlled by and or exchanged between more than one CMTrading entity, as applicable.

Any enquiries with regards to the use of your personal data should be sent to support@cmtrading.com

What Kind Of Personal Information Do We Collect And Store?

Personal data includes any and all information which an individual can be identified with and does not include any data where identity has been removed (namely, anonymous data). Upon registration with CMTrading, it is necessary that we collect your personal data in order to comply with legal obligations such as AML and other regulatory requirements. By understanding your background and needs, we can treat you fairly, provide you with the services that best match your requirements, offer you appropriate and relevant information and process your requests in a fair and efficient manner.

As part of our business, we shall collect, use, store and transfer different kinds of the personal data from customers and potential customers that include the following:

- Identity Data such as name, surname, proof of identity, date and place of birth, gender, country of residence and citizenship.
- Contact Data such as billing address, delivery address, email address, telephone number(s), proof of address.
- Financial Data such as annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copy thereof, e-wallet information.

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- Professional Data such as level of education, profession, employment details, financial awareness and trading experience.
- Transaction Data such as details about payments to and from you, information on products and services you have purchased from us, deposit methods, purpose of transactions with us.
- Technical Data such as internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access CMTrading website and Electronic Services.
- Profile Data such as your username and password, purchases or orders made by you, your interests, preferences, feedback, survey responses.
- Usage Data such as information about how you use our website, products, services.
- Marketing and Communications Data such as your preferences in receiving marketing from us and any third-party companies on our behalf and your communication preferences.
- Sensitive Types of Personal Data such as information about criminal convictions and offences.

We also collect, use and share aggregated data such as statistical or demographic data. Non-personal data may be derived from your personal data but is not considered personal data for the purposes of law as such does not directly or indirectly reveal your identity in any way whatsoever. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website and the Electronic Services feature. However, if we combine or connect aggregated data with your personal data in a way that, either directly or indirectly, identify you we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We use cookies to store and collect information about your use of our Website.

Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our Website.

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We also keep records of your trading behavior, including a record of:

- Products you trade with us
- Historical data about the trades and investments you have made, including the amount invested
- Your preference for certain types of products and services

We are required by law to identify you, if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to request, verify and record details of certain documents (i.e., photographic, and non-photographic documents) to meet the standards, set under those laws. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services we provide to you, which includes but not limited to:

- passport;
- driver's license;
- national identity card (if applicable);
- utility bills;
- trust deed (if applicable);
- a credit check on the individual;
- source of funds; and/or
- any other information/documents that we may consider necessary and relevant to our functions and activities.

If you are a corporate client, we are required to collect additional information which includes but not limited to:

- Corporate documents such as Registration Certificate, Registers;
- Source of funds;
- Activity/ies involved in;
- Jurisdictions regulated or active in;
- Shareholders, directors, officers, beneficial owners including additional personal information on the Beneficial Owners, Shareholders and Directors.

We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

We obtain this information in several ways through your usage of our services, products, websites, the account opening applications, our demo sign up forms, webinars, sign up forms, website cookies and similar tracking technology built into our Websites and Apps, subscribing to news updates and from information provided in the course of our ongoing relationship.

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We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys, or special offers). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice. Any such records can be provided to you upon request at the same language as the one used to provide services to you.

For What Purposes We Shall Process Your Personal Data

We may use your personal data for the following purposes ("Permitted Purposes"), based on the following legal grounds:

- to enter into or perform our contractual obligations towards you;
- to be compliant with the legal and regulatory requirements;
- to pursue our legitimate interests.
- for marketing purposes with your consent.

Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this Privacy Policy or by unsubscribing from email lists.

We will use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that such reason is compatible with the original purpose and the law (in which case your knowledge or consent for use thereof is not required). If you wish to get an explanation as to how compatibility of the reason and the original purpose is determined, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you accordingly and explain the legal basis which allows us to do so. Please note that we may process your personal data, where this is required or permitted by law.

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The channels used for such communications may include calling you, sending emails, notifications through your online account portal and sms notifications including push notifications. You have the right to opt out by using your online account portal or by sending an email to customer support:

support@cmtrading.com

by using the registered email address you disclosed to us, in case you do not have access to your online portal account, or one has not been provided to you for any reason.

Management Of Personal Information.

We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

We require organizations outside the CMTrading Group who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all relevant data protection laws and this Privacy Policy.

In brief, the data protection measures we have in place are the following:

- Train our employees who handle personal information to respect the confidentiality of Customer's information and the privacy of individuals
- Require our employees to use passwords and two-factor authentication when accessing our systems;
- Apply Chinese walls which enables employees only have access to the personal data required for the purposes of the tasks they handle.
- Apply data encrypting technologies during data transmission during internet transactions and client access codes transmitted across networks
- Employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorized persons and viruses entering our systems;
- Using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- Practicing a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records;

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- Employing physical and electronic means such as access cards, cameras and guards to protect against unauthorized access; and
- Limiting access to the clients' personal data to those employees, agents, contractors and other third parties who have a business with them and need to know, only process clients' personal data on the CMTrading's instructions and are subject to a duty of confidentiality.

Who We Share Your Personal Data With And In What Circumstances?

We may share your Personal Information in the following circumstances:

We may share your Personal Information between CMTrading Entities on a confidential basis as allowed by applicable law or where required for the purpose of providing products or services and for administrative, billing and other business or ancillary purposes. A list of Entities and the countries in which each is located can be found in the first section "who we are".

We may instruct service providers in or outside CMTrading, domestically or abroad, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions. CMTrading requires these service providers to enter into relevant agreements with CMTrading as such may be required by applicable laws that govern the use of any information that they receive from us. These agreements prohibit the service provider from using information of CMTrading clients other than for the purposes for which such was provided or disclosed. In accordance with applicable legislation, CMTrading will retain control over, remain responsible for your personal data and use appropriate safeguards to ensure integrity and security of your Personal Information when engaging service providers.

We may share your personal data with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies.

We may share your personal data with companies providing services in the areas of IT, trading platforms administration, translation of documents, support of clients, marketing, promoting our services and products, external and internal audit, cloud storage, payment services and banks.

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We may share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets or of CMTrading Entities; additionally, we may seek to acquire other businesses or merge with them.

We may disclose information about you to any depository, stock exchange, clearing or settlement system, account controller or other participant in the relevant system, to counterparties, dealers, custodians, intermediaries and others where disclosure is reasonably intended for the purpose of effecting, managing or reporting transactions in connection with the provision of our services or establishing a relationship with a view to such transactions.

Consistent with applicable law, we may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of an alternative dispute resolution process.

Generally, we will only disclose your Personal Information when you direct us or authorize us to do so, when we are allowed or required by applicable law or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

How Do We Store Personal Information And For How Long?

We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

We will retain your personal data for as long as necessary to fulfil the purpose we collected it for, including the purpose of satisfying any legal, accounting or reporting requirements. In order to determine the appropriate retention period for your personal data we consider, among others, any statutory or regulatory retention periods, the amount, nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it and whether we can achieve those purposes through other means, applicable legal requirements etc.

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Personal data provided by you, as a prospective client during account opening registration, will be maintained for three (3) days unless it is required by the law, to keep it for a prolonged period of time, in the event that the registration was deemed incomplete or the account opening application was rejected,.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

The data that we collect from you may be transferred to, and stored at, an outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Whenever we transfer your personal data, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data;
- In the absence of an adequate level of protection, we will transfer your personal data provided one of the legal safeguards is in place and if they provide adequate level of protection to personal data, so we have put in place appropriate data transfer mechanisms such as applicable standard contractual clauses, binding corporate Legislations and directives issued, the EU-US Privacy Shield, or any other equivalent applicable arrangements, to ensure personal data is protected.

If you would like a copy of such arrangements, please contact us using the contact details below.

If you instruct CMTrading to cease using or processing your personal data, CMTrading has the right to terminate any existing services to you immediately (or within a reasonable time, as determined by CMTrading).

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Your Legal Rights

Please note that these rights do not apply in all circumstances.

You are entitled to:

- a. request access** to your personal data (commonly known as a “data subject access request”);
- b. request correction** of the personal data that we hold about you;
- c. request erasure** of your personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- d. object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- e. request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - ✓ if you want us to establish the data’s accuracy;
 - ✓ where our use of the data is unlawful, but you do not want us to erase it;
 - ✓ where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - ✓ you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- f. request the transfer** of your personal data to you or to a third party and/or right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from us to another service provider in a safe and secure way. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information (i.e. not to hard copies) which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- g. withdraw consent** at any time where we are relying on consent to process your personal data.

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Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address:

support@smtrading.com

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or exercise any of your other rights. This is a security measure to ensure that your personal data is not disclosed to any person other than you. We may contact you to ask for information in relation to your request to speed up our response.

What If You Have A Query Or A Complaint?

If you have any questions which have not been covered in this Privacy Policy, any further concerns regarding the use of your personal data or any complaints as regards to this Privacy Policy and about use of your Personal Information you can reach out to us using the contact details available on our website or send an email to support@cmtrading.com, using the registered email address you disclosed to us.

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

If your complaint or concern is not resolved, you can contact the office of the data protection authority of your home country via their website.

Personal Data Breach

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of any breach where we are legally required to do so. If you require further information on how we deal with a data breach please contact us.

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Email:

support@cmtrading.com

RISK WARNING:

Trading Foreign Exchange (Forex) and Contracts for Differences (CFD's) is highly speculative, carries a high level of risk and may not be suitable for all investors. You may sustain a loss of some, or all, of your invested capital. Therefore, you should not speculate with capital that you cannot afford to lose. You should be aware of all the risks associated with trading on margin.