

# Privacy Notice

Trading 212 is committed to the protection of your personal data and we do not access or use it for any purpose other than providing, maintaining and improving our services and as otherwise required by law. In order to open and maintain client accounts, we obtain and hold personal information. This policy outlines how we manage such information to ensure we meet our obligations to respect our clients' privacy and that all such information remains confidential. We are bound by the terms of the General Data Protection Regulation 2016/ 679 (GDPR) and any applicable data protection law.

This Privacy Notice applies to the data processing activities of Trading 212. Trading 212 Markets Ltd., is registered in Cyprus ([Company number HE 409763](#)) authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") with CySEC's [register \(license\) number 398/21](#).

## **Trading 212 Markets Ltd.**

Phone: +357 25 343222

Email: [info@trading212affiliates.com](mailto:info@trading212affiliates.com)

Address: 18 Santorinis, 4004,

Limassol, Cyprus;

## **What sort of data do we process?**

When you access our website at <https://www.trading212affiliates.com>, (the "Website"), connect to, sign up to, participate in, create an account for our affiliate program or otherwise use our services, we may collect personal data about you. We process personal data that we receive from you in the context of our business relationship. To the extent necessary and in order to provide our services we also

process personal data that may also be obtained from publicly available sources. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect, use or otherwise process different types of personal information about you, depending on our engagement and the law, which may include:

Data	Purpose
First name and last name	Identification
Date of birth	Age identification
Identity	KYC Scoring Processing – obtaining reasonably complete information about the subject for conducting financial transactions in order to prevent money laundering, financing of terrorism and tax evasion
Residence address verifying document information	Residence identification
Residence address	Affiliate verification, provision of support services to the Affiliate, use for marketing purposes
Affiliate Contact phone number and other means of communication (including messenger apps' user IDs)	Verification, provision of support services to the Affiliate, use for marketing purposes
Email	Identification of the Affiliate account, newsletters, use for marketing purposes
Information on the Affiliate identified locale, i.e. a set of parameters that determine regional settings of the user interface, namely, residence country, time zone and the interface language of the Affiliate	Identification of the Affiliate account, newsletters, use for marketing purposes
Technical data that is automatically	Correct operation of the web application,

transmitted by the device through which the subject uses the Controller website, including the device's technical characteristics, IP address, information in the cookies files that have been sent to the subject device, information about the subject browser, the operating system name and version, the date and time of access to the site, the requested pages' addresses	mobile and desktop versions of the Controller application; monitoring of the Affiliate behaviour
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## Who are the recipients of your personal data?

Your personal data is received and processed by those employees of Trading 212 that need it for the execution of contractual, legal and regulatory obligations. Further, we may disclose, to the extent we deem such disclosure or transmission is necessary for satisfying the purposes set out above, to the following recipients:

- Any lawyers, external auditors or advisors, professional consultants, credit reference agencies, notaries, bailiffs, as well as any courts, regulatory, governmental, administrative or other official bodies as agreed or may be required by law, where such disclosure is necessary (i) to comply with any applicable law or regulation; (ii) to enforce applicable terms and conditions or policies; (iii) to protect the security or integrity of our services; and (iv) to protect our rights and interests;
- third-party service providers that provide IT services, advisory and consultancy services, research, identity verification checks, payment processing services, insurance or other services to Trading 212, which are only authorized to process your personal data strictly for the purposes of providing these services and in accordance with our instructions. If applicable, we will enter with such third-party service providers into the relevant contractual agreements or the standard data protection clauses that would be required under the GDPR to ensure compliance with our instructions;

State authorities authorized to receive personal data and/or auditors and/or consultants and/or accountants and/or notaries and/or lawyers (if necessary).

## **Why we process your data?**

### *Purpose and legal grounds*

We process the aforementioned personal data in compliance with the provisions of GDPR and the applicable local legislation as amended from time to time. Please note that we may also be processing information in relation with all or one of the following:

- Any anti-money laundering legislation and recommendations;
- The Markets in Financial Instruments Directive II (MiFID II) and all relevant implementing rules and regulations;
- Performing our duties and/or obligations and exercising our rights under our business relationship, such as communicating with you with regards to updates to our products, services and/or marketing guidelines;
- Safeguarding our legitimate interests.

## **How long will your data be stored?**

We will keep your personal information for as long as we maintain our business relationship. Upon termination of our business relationship we will maintain your data in compliance with our legal and regulatory obligations for a period of 5 to 7 years. Further, any personal data will not be retained for longer than the time necessary for satisfying the purposes of its processing, subject to the general statutory limitation periods and the mentioned retention period where the applicable laws requires that the personal data is retained for a certain period after the termination of our business relationship with you.

At the expiration of data retention time the data is erased by irreversible destruction and/or is anonymised.

## **How we use your personal information?**

This privacy notice aims to let you know how and for what purposes Trading 212 uses, processes and looks after your personal information. Below we provide information about the processing of your personal data and the data protection rights you are afforded. The content and scope of the data processing are largely based on services that have been agreed with you.

For full details as to our policies and procedures and how we process and protect your personal details please refer to our Privacy Policy.

## **Transferring Information Internationally**

The personal data that we collect from you may be transferred to and stored at a destination outside the EEA, including at destinations that are or aren't subject to a decision by the European Commission establishing an adequate level of protection of personal data. It can be shared with other companies within the Trading 212 Group, processed by staff working for us or for one of our suppliers, located outside the EEA. Such personnel may for example be involved in execution of our support services. We will take all reasonable necessary steps to ensure that your personal data is treated securely and in accordance with this Privacy Policy and have adopted appropriate safeguards to protect it.

Please note that if service providers in a third country are used, all reasonable and practicable measures will be taken to ensure that they will comply with the data protection level in Europe in accordance with the GDPR.

Any transfers to parties located outside the European Union will be in line with the legal and regulatory provisions of the GDPR and applicable local legislation as amended from time to time.

## **What are your rights regarding your personal data processing?**

You have the right to:

1. i. access and obtain information about your personal data – you have the right to request us what information (if any) we process for you and if so, provide you with an information containing your personal data and a copy of

that personal data undergoing processing. To request information, we will need to verify your identity. If you require additional copies, we may need to charge a reasonable administration fee for requests that we deem are manifestly unfounded. Upon receiving a request from you and/or upon the receipt of the applicable fee, we will acknowledge your request and respond to you within one month as from filing your request.

2. ii. rectify any factual inaccuracies or incompleteness with respect to your personal data - If the personal data we hold about you is inaccurate or incomplete, you are may ask from us to correct it. Upon receiving such a request from you, we will acknowledge it and respond to you within one month as from filing your request. If we have shared your personal information with others, we will let them know about the rectification where possible.
3. iii. request deletion of your personal data - you can ask us to delete or remove your personal data in cases where we no longer need it. However, please note that such request will be satisfied provided that we have no legal obligation to retain such data and will be subject to any retention periods we are required to comply with in accordance with applicable laws and regulations as specified in section "How long will your data be stored" above.
4. iv. request restriction of processing - you can ask us to restrict the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal information, for a period enabling Trading 212 to verify the accuracy of your personal data or in case you deem the processing is unlawful. Such objection may not impede us from storing your personal information though.
5. v. object to the processing of personal data by Trading 212 - you can require from us to terminate the processing of your personal data, and we will comply with such request in cases where your personal data is processed for the purposes of direct marketing or research (if applicable) or if we are relying on our own legitimate interests to process your data except if we can demonstrate compelling legal grounds for the processing.

6. vi. request portability of your personal data – you have the right, when applicable, to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and to transmit those data to another entity (data controller) of your choice when this is technically possible.
7. vii. lodge a complaint with a supervisory authority – you have the right to lodge a complaint regarding our processing of your personal data with your supervisory authority.

## **How to contact us and how to complain?**

If you have any questions with regard to your rights or the present policy or if you consider that we have failed to respect your confidentiality, you may contact us by:

Phone: +44 20 8089 5549

Email: [info@trading212affiliates.com](mailto:info@trading212affiliates.com)

Address: 3 Lachezar Stanchev Str.

Litex Tower, floor 10

Sofia 1756, Bulgaria

We inform you that we use a video surveillance in our offices and if you visit any of our office premises, you may be subject to video recording. We are also obliged by law to record all our telephone conversations with clients.

## **Trading 212 Data protection officer**

You may also contact our Data Protection Officer about any request you have related to your personal data: Email: [dpo@trading212.com](mailto:dpo@trading212.com)

## **How do we manage and protect your personal data?**

We put a lot of efforts and apply highest technical and organizational standards to ensure that your personal data is secured and kept confidential. Any personal data

that you provide to us is stored on secure servers and we use rigorous procedures to protect against loss, misuse, unauthorized access, alteration, disclosure, or destruction of your personal data. We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Changes to our privacy policy**

We reserve the right to modify this Privacy notice and our [Privacy Policy](#) from time to time. Any such modifications will be posted on our website.