



## Privacy Policy

# Privacy Policy

## INTRODUCTION

As part of our daily business operations, we need to collect personal data from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services, as well as when providing them with the respective information.

Errante Trading LLC (hereafter the “**Company**”, “**Errante**”, “**we**”, “**our**”), is a company incorporated and registered under the Laws of St. Vincent and the Grenadines under Registration Number 191 LLC 2019, with registered address Suite 305, Griffith Corporate Center, Beachmont, 2009 Kingstown, St. Vincent and the Grenadines.

This Privacy Policy (the “**Policy**”) describes how your personal information is collected, used, shared or otherwise processed, when you visit our Company’s website, i.e. <http://www.errante.net> (the “**Website**”) or decide to use any service available through the Site, or apply to be provided with any investment services or products we are authorized to offer or through a third party in connection with our provision of services to you. webis

This Policy applies to the processing activities performed by the Company to the personal data of its clients/potential clients, website visitors. This Policy does not apply to websites operated by any other organisations and/or other third parties.

We are dedicated to protecting your confidentiality and privacy of your personal data and handling your personal data in a transparent manner. Our Company is committed to ensuring that we collect, use, share, disclose or otherwise process personal data in accordance with the requirements described in this Policy.

## DEFINITIONS

For the purposes of this Policy:

- **Cookies:** are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>
- **Log files:** track actions occurring on the Website, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- **Personal data:** means any information that could be used, on its own or in conjunction with other data, to identify an individual, directly or indirectly, such as name, identification number, location data, etc.
- **Processing:** means any operation or set of operations which is performed on personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, erasure or destruction.

- **Web beacons:** are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

## PERSONAL INFORMATION WE COLLECT

In order to open an account with us, you must first complete and submit the application form to Us by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable Us to assess your application and comply with the relevant rules and regulations. The information you provide may also be used by Us to inform you regarding Our services.

The information that we may collect from you includes:

- ✓ full name, residential address and contact details (e.g., email address, telephone number, etc.);
- ✓ date of birth, place of birth, gender, citizenship, nationality;
- ✓ information about your income and wealth, including details about your source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;
- ✓ trading account balances, trading activity, your inquiries and our responses;
- ✓ information on whether you hold a prominent public function (PEPs);
- ✓ profession and employment details (i.e. employer name, position held);
- ✓ location data (IP address);
- ✓ verification information, which includes information necessary to verify your identity such as a passport, ID or driver's license copy (examples also include background information we receive about you from public records or from other entities not affiliated with us); furthermore, we may collect other identifiable information such as Tax Identification Numbers;
- ✓ Supporting documentation that verify your residency such as utility bills and bank statements;
- ✓ Financial details such a bank account details, credit card details, bank statements, loan agreements, credit facilities tax references, information regarding your investment objectives;
- ✓ any other similar information.

Our Company may collect and process the above personal data for individuals who visit our website, individuals who decide to use any service available through our Website or individuals who are current, former or prospective clients, including, without limitation:

- i. Individuals connected or relevant to legal entity clients, such as, directors, company secretaries or other individual office holders of our legal entity clients;
- ii. Shareholders, nominee and ultimate beneficial owners of our legal entity clients;
- iii. Legal representatives, agents and/or other individuals authorized to act on behalf of our clients.

## **MINORS**

The Company's services are not available to individuals who are under the age of eighteen (18) ("**Minors**"). We do not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us.

## **HOW WE OBTAIN YOUR PERSONAL INFORMATION**

We obtain this information in a number of ways through your use of our services including through any of our website, apps, the account opening applications, our demo sign up forms, subscribing to our newsletter and from information provided in the course of ongoing customer service communications. We may also collect this information about you from third parties when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies (i.e Thomson Reuters Database, Registrar's website, etc.). Also, we may collect information about you, when you use or connect to the Company by or through a third-party platform (i.e. LinkedIn, Facebook or other sites) you allow us to access and/or collect certain information from your Third Party Platform profile/account as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third-party platform for their use.

We also keep records of your trading behaviour, including records regarding:

- products you trade with us and their performance;
- historical data about the trades and investments you have made, including the amount invested;
- your preference for certain types of products and services.

We may ask for other personal information voluntarily from time to time (for example, through market research or surveys). 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 business 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. Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

## **PERSONAL INFORMATION COLLECTED AUTOMATICALLY**

When you access or use our Services, we automatically collect information about you, including:

- ✓ Log Information  
We collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.
- ✓ Device Information

We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

✓ Activities on Website

We collect records of activities on the Website, including, any content you post, your account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method.

✓ Location Information

In accordance with your device permissions, we may collect information about the precise location of your device.

✓ Information Collected by Cookies and Other Tracking Technologies

We use cookies to ensure that our website works effectively and to support your trading activities. Our cookies do not contain any personal data, account numbers, or passwords.

We may enlist outside organizations to help us manage the website and collect and analyze statistical data. These outside organizations may install and use their own cookies on our behalf.

## HOW WE USE YOUR PERSONAL INFORMATION

The Company may need Clients' Personal Information for the following Reasons:

- i. To verify the Client's identity;
- ii. To process the Client's transaction;
- iii. To ensure that the Client meets the suitability requirements to use the Company's products and services;
- iv. To manage the account the Client holds with the Company;
- v. To send to the Client any information about transactions services;
- vi. To inform Client about new product of Company, services and any other information relevant to the Client's business relationship with the Company;
- vii. For the analysis of statistical data which will helps the Company in providing its Clients with better products and services in the future.

## HOW WE SHARE YOUR PERSONAL INFORMATION

We shall not disclose any of its clients' confidential information to a third party, except:

- i. to the extent that it is required to do so by under and/or pursuant to any Applicable Laws, Rules and/or Regulations;
- ii. where there is a duty to the public to disclose;
- iii. where our legitimate business interests require disclosure; or
- iv. at your request or with your consent to the parties described below.

Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of any such information. As part of using your personal data for the purposes set out above, the Company may disclose your personal information to the following:

- ❖ between and among the Company and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- ❖ our Associates, for business purposes, including certain third parties such as service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, insurance, research or other services;
- ❖ business introducers with whom we have a mutual business relationship;
- ❖ business parties such as payment service providers, credit institutions, IT hosting companies, credit reference agencies
- ❖ courts, tribunals, public and regulatory authorities as agreed or authorised by law; and
- ❖ anyone authorised by you.

In the event that the Company discloses your personal information to business parties, such as card processing companies or banks, in order to perform the services requested by clients, such third parties may store your information in order to comply with their legal and other obligations. Also, third party service providers such as credit referencing agencies (if and when applicable) may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches. Please note that the use of your personal information by

external third parties who act as data controllers of your personal information is not covered by this Privacy Policy and is not subject to our privacy standards and procedures.

Generally, we require that organisations who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this Privacy Policy.

Clients accept and consent that the Company may, from time to time, analyse the data collected while visiting our website(s) or by other means, such as questionnaires, for statistical purposes in order to improve the Company's business activities.

## **STORAGE AND RETENTION OF PERSONAL INFORMATION**

Safeguarding your privacy is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will hold personal information, for as long as necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The recordkeeping is in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time, i.e. we are subject to certain anti-money laundering laws which require us to retain the following, for a period of 5 years after our business relationship with you has ended, such as a copy of the documents we used in order to perform our customer due diligence and supporting evidence and records of transactions with you and your relationship with us.

## **SECURITY**

The personal information you provide us with when registering yourself as a user of our Website and/or of our services is classified as registered information, which is protected in several different ways. You can access your registered information after logging in to the Members Area by entering your username and your password. It is your responsibility to make sure that your password is only known to you and not disclosed to anyone else. Registered information is securely stored in a safe location and only authorised personnel have access to it via a username and a password. All personal information is transferred to the Company over a secure 128-bit SSL connection and thus all necessary measures are taken to prevent unauthorised parties from viewing any such information. Personal information provided to the Company that does not classify as registered information is also kept in a safe place and accessible by authorised personnel only via a username and a password.

Transmission of information via the internet is not always completely secure but we endeavor to protect your personal data by taking serious precautions. Once we have received your information, we will apply procedures and security features to try to prevent unauthorised access.

The Company shall not be liable for unlawful or unauthorised use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use.

## **YOUR RIGHTS**

Your rights regarding your personal information which we are committed to facilitating the exercise of those rights and how you can exercise them, are specified below:

i. Access to personal information

If you ask, we will confirm whether we are processing your personal information. If we do, then if requested we can provide a copy of what information we process within thirty (30) days from the date of your request.

ii. Rectification of personal information

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also inform you who we have shared your personal information with so that you can contact them directly.

You shall inform us at any time that your personal details have changed by email at [backoffice@errante.com](mailto:backoffice@errante.com). The Company will update your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e. personal information that we are required to keep for regulatory or legal purposes.

## **WHEN WE NEED TO UPDATE THIS POLICY**

We may need to change this policy from time to time in order to make sure it stays up to date with the latest legal requirements and any changes to our privacy management practices.

When we do change the policy, we'll make sure to notify you about such changes, where required. A copy of the latest version of this policy will always be available on our website.

## **ENQUIRIES**

For any enquiries regarding this Policy, please contact our Customer Support Department at [support@errante.net](mailto:support@errante.net)