

Investing.one

Privacy Policy

Tradeplace Limited (hereafter “the Company”), is responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening a trading account with the Company, a client gives consent to such collection, processing, storage and use of personal information by the Company as explained below.
The Company is committed to its privacy obligations under the Principles contained in the Personal Data Processing (Personal Protection) Law, as amended from time to time, and the European Union GDPR (General Data Protection Regulation) which replaced the previous Data Protection Directive 95/46/EC.
Tradeplace Limited is the “Data Controller”, as defined by the GDPR, and they have appointed a Data Protection Officer who can be reached at dpo@investing.one although your initial point of contact should be our Customer Service team.

The collection of personal information

The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively.

The information the Company collects includes information required to communicate with and identify its clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.

The personal data we collect about you may include:

- Information you provide to us on applications and other forms, such as your name, address, date of birth, occupation, employer, assets and income, telephone or mobile number, email address and bank account details;
- Information about your transactions with us and with our affiliates;
- Information we receive from other entities not affiliated with Tradeplace Limited; and
- Information you provide to us to verify your identity, such as a passport, or information and documents received from other entities not affiliated with Tradeplace Limited.

Biometric & Face Data

We collect and process face data when you use identity verification functionality in the app. Face data includes images or biometric representations captured by your device's camera for the purpose of verifying your identity.

Purpose: We collect an image of your face (selfie) and/or a video liveness check to establish and to identify you, and verify that you are the holder of the identity document provided. This facial data is used solely for the purpose of identity verification and fraud prevention.

Storage & Retention: Your face data is stored in accordance with applicable CySEC (Cyprus Securities and Exchange Commission) and Anti-Money Laundering (AML) regulations. These regulations require us to retain identity verification data for at least 5 years from account closure to ensure compliance with financial record-keeping obligations and to support potential regulatory audits or fraud investigations.

Third Parties: We share face data with our identity verification service provider, Sumsub, to perform liveness checks and confirm that the person matches the provided identification documents. Data is shared only for this purpose and is transmitted securely.

Third-Party Storage: Sumsub may temporarily process and store face data while performing verification. According to their data handling practices, this data is deleted when no longer needed to fulfill verification obligations. Please consult Sumsub's privacy notice for details on their retention practices and protections: https://sumsub.com/privacy-notice/.

If you choose not to permit face data access, these identity verification features will not function.

Use of personal information

The Company uses client personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes.

If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following address: support@investing.one

Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

The transmission of information via the Internet is not completely secure. We cannot guarantee the security of data transmitted to our online services and any transmission is at your own risk.

To try to prevent this, we use both GeoTrust Secure Socket Layer (SSL) and Transport Layer Security (TLS) encryption technology in order to protect the information that you submit to us. This type of technology is designed to protect you from having your information intercepted by anyone other than Tradeplace Limited during its transmission. We also use other safeguards such as firewalls, authentication systems (e.g. passwords and personal identification numbers) and access control mechanisms to restrict unauthorised access to systems and data. Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

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

Some electronic communications through non-secure web platforms may not be secure, virus-free or successfully delivered. If you communicate with us using a non-secure web platform, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

You can help us to keep your information secure. Remember that any username or password in relation to our websites is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

Affiliates and Partners

The Company may share information with affiliates in the event such information is reasonably required by such an affiliate in order to provide the products or services to clients.

The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.

Non-affiliated third parties

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy Policy.

The Company reserves the right to disclose personal information to third parties where required by Law, regulatory and other government authority. The Company may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal

information with third parties which it considers will not provide its clients the required level of protection.

Contact Clients

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company's financial products and services. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

Restriction of responsibility

The Company is not responsible for the privacy policies or the content of sites to which links https://investing.one/ and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

Use of "COOKIES"

The Company uses cookies to secure clients' trading activities and to enhance the performance of the https://investing.one/ websites. Cookies used by the Company do not contain personal information or other sensitive information.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the https://investing.one/ websites, the Company may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Tradeplace Limited uses cookies to capture data to help us improve the service offered and to make improvements in relation to the quality of content contained on our Websites. You can choose whether to accept Cookies or not on your computer.

About Hyperlinks

Tradeplace Limited website may contain hyperlinks or links to other sites, and other sites may link to our sites. These websites that may be linking to or from Company's site may have its own privacy policies. Tradeplace Limited privacy policy applies exclusively to the Company and information collected by us.

The Company is not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is

important that you realise this information is going to a third-party, and you should become familiar with the privacy policy provided by that third-party.

Accessing and updating your Personal Data

You have the right to request a copy of the personal data about you which we hold in order to correct any inaccuracies and to object to our using your personal data for a marketing purpose, and this is known as a Subject Access Request.

To do this, you should contact us using the details set out below in the “Contact Us” section. There is no fee for requesting that your personal information is corrected, however in processing your request, our reasonable costs may be recovered if necessary if the relevant legislation allows. This covers such things as locating the information and supplying it to you.

Where we refuse to action your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

Data Erasure

Known as the ‘right to be forgotten’, you may request that we delete all personal data about you which we hold, although we are limited by the law with regards to who this applies.

The conditions for erasure, as outlined in article 17 of GDPR, include the data no longer being relevant to original purposes for processing, or clients withdrawing consent.

For the Company, this only apples to data held for non-Live accounts. We are legally obligated NOT to delete any data for clients who have had live accounts with us for at least 7 years.

Data Portability

GDPR introduces data portability, which is the right for a client to receive the personal data concerning them, which they have previously provided, in a 'commonly use and machine-readable format' and have the right to transmit that data to another data controller. This means that if requested by a client, the Company will put all their data onto a CSV file and if requested send that file to another company.

Summary

With the introduction of the GDPR, you have additional rights with regard to your Personal Data. Some of these may not be applicable to you due to additional regulatory obligations placed upon us which we are required to meet for all Live accounts that have been opened.

Right to be informed
You have the right to be informed about what we do with your Personal Data, which is why we have made this Privacy Policy available to you on our website.

Access to your Personal Data
You have the right to request a copy of the personal information that we hold about you, and if you wish to exercise that right please contact dpo@investing.one.

Correction of Personal Data

You can make a request for us to correct any personal data that we are processing about you which is incorrect.

Right of erasure

You can request that we erase your personal data if there is no reason for us to continue using it. This right only applies in certain circumstances, and it is not a guaranteed or absolute right, as we have regulatory and legal obligations in certain circumstances to continue holding Personal Data for at least 7 years.

Right to data portability

This right allows you to obtain a copy of your Personal Data which we hold in a format that will enable you or us to transfer it to another organisation. Multiple requests of this type may incur a fee to cover reasonable expenses.

Right to restrict processing of personal data

You have the right in certain circumstances to request that we suspend our processing of your personal data. For example, you have the right to opt out of Marketing emails. Where we suspend our processing of your Personal Data we will still be permitted to store your Personal Data, but any other processing of this information will require your consent, subject to certain exemptions.

Right to object to processing of Personal Data

You have the right to object to our use of your Personal Data which is processed on the basis of our legitimate interests. However, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so, or we need to process your personal data in connection with any legal claims.

Rights relating to automated decision making and profiling

You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request that we involve one of our employees or representatives in the decision-making process.

Privacy Policy Updates

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded in the Company's website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

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