

## TERMS AND POLICIES

At Trade wind we value your privacy and strive to protect your personal data. Trade wind will only collect and use your personal data in accordance with this Privacy Policy, our Cookie Policy and our Terms of Use.

### **This Privacy policy explains:**

1. which Trade wind entity controls your data;
2. how we collect, process and share your personal data;
3. the important security measures we maintain to secure your personal data;
4. what rights you have in respect of the personal data we hold on you; and
5. why and how we retain your personal data.

### **1. OUR RELATIONSHIP WITH YOU:**

Depending on which country or region you have verified your Trade wind account in, you may be a customer of a specific Trade wind entity.

References in this Policy to “Trade wind”, “we”, “us”, “our” or any similar term is to the relevant Trade wind entity you are a customer of. Here is a table which provides the information on which Trade wind entity who have contracted with:

### **2. COLLECTING YOUR DATA:**

In order to open and operate an account for you, provide you with our products and services, or communicate with you, we may need to collect your personal data.

We may collect the following types of personal data:

- \* personal identification information such as your full name, date of birth, nationality, cellphone or mobile number, email address, place of residence (and/or proof of residence), employment status, industry of employment and/or national identification number or social security number;
- \* information for purposes of biometric identification such as the selfie you provide to us when creating your Trade wind account, video/audio recording, or other evidence of yourself with your identification documentation;
- \* national identity documentation such as a copy of your national identity document, drivers’ license or passport (including any relevant visa information) and/or any other information deemed necessary to comply with our legal obligations under financial or anti-money laundering laws;

\* financial information such as your source of funds, bank account information, credit and/or debit card information, transaction history, tax documents, or other proof of income or net worth;

\* transaction information such as your transaction data on your Trade wind account and information on the recipient of any transaction(s);

correspondence such as information provided to us when engaging with our customer support and/or responses to surveys;

information lawfully obtained from third parties such as credit information, online identifiers relating to fraud prevention, suspected criminal activity, sanction information or other personal information about you provided by a service provider appointed to help us provide our services;

**Personal data is collected in various ways, including:**

2.1 when you provide it to us such as when you sign up for a Trade wind account, use our products and services, or take part in customer surveys, competitions and promotions;

2.2 when you communicate with us by email, chat, telephone or any other means, we collect the communication and any personal data provided in it;

2.3 when you use the Trade wind platform we collect information on your transactions and usage of your Trade wind account;

You must be 18 years or older to open a Trade wind account. Our products and services are directed at adults aged 18 years and over, and are not intended for individuals under 18 years old. Trade wind will not knowingly request to collect personal data from individuals under the age of 18. Trade wind makes all efforts to comply with applicable local legal requirements regarding children's personal data.

**Processing your personal data:**

We will only collect, use, share or otherwise process your personal data where it is necessary for us to carry out our lawful business activities and subject to the data protection laws in your country or state.

In doing so, we rely on one or more of the following lawful grounds for processing your personal data:

**Contractual necessity:** We may process your personal data where it is necessary in order for us to provide our products and services to you or to otherwise comply with our obligations under Trade wind's Terms of use.

**Consent:** In some cases, we will only process your personal data where you provide us with your express consent for such processing.

Legal obligation: In some cases, we may need to process your personal data in order to comply with an obligation imposed by law.

Legitimate interest: In some cases, we may need to process your personal data where it is in our legitimate legal interests to do so

**HOW WE USE YOUR PERSONAL DATA:**

More specifically, we may process your personal data for one or more of the following purposes:

to verify your identity in accordance with Know Your Customer (KYC), Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) requirements;

to perform sanctions screening on you in compliance with all required sanctions screening processes imposed by, for example, the United Nations, European Union, UK Treasury and US Office of Foreign Assets Control (OFAC), International monetary fund (IMF) and to take measures to prevent transacting with individuals and companies

to manage and maintain your account with us;

to detect and prevent fraudulent or unauthorized use of our products and services;

to better manage our business and your relationship with us, including for purposes of quality control and staff training to make sure we continue to provide you with accurate information, products and services;

to improve our products and services, and to develop new products and services;

to notify you about benefits and changes to the features of our products and services;

to provide you with personalized advertising and marketing;

to respond to your inquiries and to resolve disputes;

in relation to legal claims, compliance, audit, risk management, law enforcement processes and regulatory functions;

in connection with the acquisition, merger or sale of a business.

Where we are required to process criminal history information, biometric information or any other type of special personal data about you in connection with any of the purposes listed above, you expressly consent to the collection, use and storage of this personal data about you. If you choose to withdraw your consent, we refer you to the section below titled "Your right to access, update, or remove your

personal data”. Please note that, should you withdraw your consent, you will no longer be able to use the Trade wind products and services.

**Sharing your personal data:**

any person that works for us or for one of our group companies;

any entity that forms part of the Trade wind group of companies in order to process payments you have authorized, provide you with support or otherwise provide our products and services to you;

financial and other institutions we partner with to process payments you have authorized and otherwise to provide our products and services;

third party cryptocurrency (or virtual or digital asset) service providers when you send cryptocurrency over the block-chain. The third party service provider may also use this information to screen and process the relevant transaction;

companies and organizations that provide services to us, including in relation to technical infrastructure, marketing and analytic, and web and app development;

**3. SECURITY OF YOUR PERSONAL DATA**

Trade wind places great importance on ensuring the security of your personal data. We regularly review and implement appropriate and reasonable technical and organizational security measures to keep your personal data safe. Employees of Trade wind are trained to handle personal data securely and with the utmost respect, failing which they may be subject to disciplinary action. Although we take steps to secure your personal data, we cannot guarantee that your personal data will always remain secure and, in the event of a data breach, we refer you to immediately contact the “support team”. Importantly, you are responsible for securing the login credentials for your Trade wind account and otherwise complying with the Account Security section of Trade wind's Terms of Use.