



Just2Trade

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European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Just2Trade, Inc treats personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided in accordance with the European Union's General Data Protection Regulation (GDPR) with regard to Just2Trade's responsibility as a data controller.

Purposes of Data Processing

We collect and process your personal data for our everyday business purposes, such as processing your transactions, including wire transfers; opening and maintaining your account(s).

The types of personal information we collect and share depend on the product or service you have with us. This information can include Social Security number and income; assets and investment experience; and transaction history and wire transfer instructions.

We also process your personal data in order to comply with applicable U.S. laws. Basis for such processing are our legitimate interests, as we could not provide you with the required services unless we complied with U.S. laws.

We also process your personal data for direct marketing and joint marketing with other financial companies based on your consent. You maintain the ability to opt out of direct marketing and joint marketing for and on behalf of Just2Trade.

Personal Data Not Obtained From You

We obtain personal information about you from other sources, including those publically accessible, in order to assist us in verifying your identity.

Recipients of Personal Data

We share your personal data with affiliated and nonaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements. These service providers may include

- Audit, Accounting or recordkeeping services
- Statement providers
- Trading platforms
- Credit bureaus, background-check providers and legal data services
- Mailing vendors



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- Affiliated companies
- Third party partners of Just2Trade
- Other vendors and entities as necessary

Location

Just2Trade and its affiliated providers, with whom we share your personal data, may be based in the United States or internationally.

Data Retention

We process and retain personal data for as long as is required to provide services, which is typically for the duration of our relationship with you or your designee. The criteria used to determine extended data retention (such data will be kept confidential, unless otherwise required by law) depend on our responsibilities as a financial institution to comply with regulatory and legal requirements, along with corporate standards, prevent fraud and market abuse, and maintain cyber and information security and privacy protections, as well as data integrity and system controls.

Just2Trade also utilizes cloud storage solutions that may in some cases mean that personal data will be stored on servers held in other countries. As with all our third-party data processors, they will be required to adhere to our high standards of data privacy. Under GDPR, all data processors – (i.e. external companies or individuals who process data on our behalf) are held to the standards of GDPR, whatever the jurisdiction they are present in – so that those who are outside of the EU still need to comply.

Your GDPR Rights

You can exercise or address these rights (subject to retention and other requirement under applicable law) that are summarized below by contacting us as support@just2trade.com. Under the General Data Protection Regulation every individual European Union citizen has the following rights:

- the right to be informed; - i.e. what data is being gathered and how it is being used and stored
- the right of access; i.e. the right to see what personal data any company has relating to you
- the right to rectification; e.g. ensuring data are accurate and up to date, and corrected if not
- the right to erasure; - often referred to as ‘the right to be forgotten’ – erasure of all data at your request;
- the right to restrict processing; i.e. to limit data usage;
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- the right to data portability; i.e. for your data to be sent to another company on your behalf, at your request
- the right to object; and – You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- the right to withdraw consent from Just2Trade’s direct marketing and not to be subject to automated decision-making including profiling. Just2Trade does not currently use any automated decision-making processes.
- the right to complain with a supervisory authority - You have the right to lodge a complaint with a Supervisory Authority within your Member State.

In order to legally process personal data we need to rely on one or more of the following conditions:

- Consent - the individual has given clear consent for you to process their personal data for a specific purpose.
- Contract - the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- Legal obligation - the processing is necessary for you to comply with the law (not including contractual obligations).
- Vital interests - the processing is necessary to protect someone’s life.
- Public task - the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- Legitimate interests - the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.

If we have obtained your consent to process your data, you have the right to withdraw that consent, at which point we will no longer be able to process your data – if that is the only condition which we are relying upon to justify the processing.

Please note, however, that in cases where we have a legal and/or regulatory obligation, we may need to continue to process your data regardless of consent. For example, as a regulated firm we have a legal obligation to retain records of clients and trades. This legal obligation could mean that even if we are asked by a client to erase or restrict their personal data, we may not be able to legally do so. We may also not be able to provide all personal data held if doing so would contravene the personal data rights of a third party.



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Similarly, if you choose not to consent to our processing of personal data it may cause Just2Trade to no longer be able to fulfill our contractual obligations and we may in certain instance have to effectively end our relationship. Each request will be dealt with on a case by case basis.

Over the Telephone

Just2Trade records telephone calls as part of its ongoing regulatory obligations and for monitoring and training purposes. These calls are kept for a pre-determined amount of time; however, this can be extended if our regulator makes such a request. The calls are stored securely and with limited access given to specific employees, Job applicants, current and former Just2Trade employees.

Information about Cookies

Cookies are text files containing small amounts of information, which your computer or mobile device downloads when you visit a website. Like most firms, Vision uses cookies to help navigate between pages and remember your preferences. If you visit Just2Trade's website, we use cookies to customize your online experience, store your login credentials, and to prevent and detect fraud. When you visit our website from any device (mobile, tablet or PC), we collect information about your use of the site, including information about the device and browser you use to access the site, the way you interact with this site, and the IP address your device connects from. You may not be able to initiate or complete some activities within our secure online services unless these cookies or similar technologies are installed.

Just2Trade has legal obligations under the money laundering regulations 2007 to identify and verify its customers and perform ongoing monitoring on customer data. As part of customer identification ("KYC") procedures Just2Trade collects personal information and in some cases sensitive personal information, such as phone numbers, e-mail addresses and financial details, along with identification information such as date of birth, residential address and nationality. Just2Trade may also hold personal information (including sensitive personal information) obtained through publicly available sources such as credit agencies, media publications and company registries.