

Privacy Policy

Who are we?

Here at Pleasing Golden, we provide one of the safest online trading platforms to our clients and partners. We believe in developing a sustainable workforce through our years-long experience, in-depth knowledge of the financial market, and the association of our trusted partners.

Our commitment lies in safeguarding your privacy and ensuring the protection of any personal information we obtain from you.

What is the purpose of this policy?

This policy aims to outline the personal information we gather and elucidate how both we and our affiliated companies might employ it. Our affiliates may consist of our subsidiaries, or we may collectively operate as subsidiaries under a unified incorporated entity.

We exercise control over any personal information you furnish to us, empowering us to determine the purposes for its utilization and the manner in which we process such information.

How do we obtain and store your personal information?

We actively acquire and process your personal information through diverse channels like applications, emails, letters, telephone calls, text messages, cookies, and various communications. Notably, when you engage with our Service, including the utilization of educational tools, demo accounts, and trading simulators, we gain access to pertinent personal details about you.

Furthermore, it is important to highlight that we retain the prerogative to monitor or record your phone conversations and meticulously oversee, as well as archive, your communications with us via emails and electronic platforms.

In upholding the paramount importance of data security, we rigorously adhere to robust procedures to store and disclose your personal information, thereby ensuring stringent safeguards against unauthorized access.

What types of personal information do we collect and process?

We may engage in the processing of various categories of personal information to enhance our service provision. These encompass:

- a. Name
- b. Email address
- c. Phone number
- d. Trading knowledge and experience
- e. Username and password
- f. Information pertaining to your trading account, encompassing account history, activity, and orders
- g. IP address
- h. Transaction Report Instructions
- i. Operating System details
- j. Information about your use of our services, products, and features, including data acquired during the utilization of educational tools, demo accounts, and trading simulators, etc.
- k. Bank account number
- l. Sort code
- m. Passport number

We emphasize our commitment to ensuring the security and confidentiality of this information while aiming to enhance your overall experience with our services.

How do we check your identity?

In adherence to anti-money laundering regulations, it is imperative for us to authenticate the identities and addresses of our customers and specific third parties. Upon the initiation of your account, we may request your original documents to confirm your identity. Furthermore, we reserve the right to verify your identity through collaboration with a credit reference institution. It's important to note that lenders are incapable of viewing or utilizing our search option to assess your loan eligibility. All our searches are meticulously conducted with robust security measures in place, ensuring that the personal information received remains entirely confidential and impervious to unauthorized access.

When may we share your personal information?

We may disclose your personal information to various entities, including:

- a. Financial Regulatory or Tax Authorities: Sharing with relevant financial regulatory or tax authorities as required.
- b. Crime Prevention Agencies: Disclosing to certain third parties, such as the police, whom we reasonably believe are necessary for the prevention of crime.
- c. Subsidiaries: Sharing information with our subsidiaries.
- d. Service Providers and Consultants: Engaging third-party service providers and consultants for administrative, financial, research, or related services in connection with the services we offer.
- e. Introducing Brokers (IB) and Commercial Partners: Sharing with our Introducing Brokers (IB) and other commercial partners.

- f. Professional Advisors: Providing information to our professional advisors.
- g. Auditors: Sharing with auditors for financial and regulatory audit purposes.
- h. Agents, including Credit Reference Institutions: Authorizing agents, including credit reference institutions, to conduct credit and identity checks, money laundering checks, regulatory compliance reporting, and fraud prevention checks on our behalf.
- i. Legal and Regulatory Compliance: Enabling courts, tribunals, financial regulatory or tax authorities, and government bodies to enforce our contract with you or to comply with their requirements.
- j. Trade Knowledge Base: Inclusion in our Trade Knowledge Base.
- k. Other Necessary Parties: Involving other relevant parties required to best serve you as our customer.

In all instances, we mandate that external organizations, excluding our subsidiaries, receiving your personal information adhere to strict confidentiality standards, respecting your right to privacy and aligning with data protection principles, in accordance with the commitment outlined in this policy.

What is the legal basis for our processing of personal information?

The legal foundation for processing your personal information is contingent upon the purpose for which we process it.

- a. **Contractual Basis:** We process your personal information when you engage in or have contracted to receive our services. This is essential for the initiation and fulfilment of our contractual obligations with you. Failure to provide the requested personal information may result in the inability to deliver some or all of the intended services.
- b. **Legal and Regulatory Obligations:** We may process your personal information to comply with legal and regulatory requirements, encompassing activities such as anti-money laundering, counter-terrorism, sanctions investigations, as well as addressing complaints and participating in investigations or litigation.
- c. **Legitimate Interests:** We have a legitimate interest in processing your personal information for the following purposes:
 - Providing services, products, or information as agreed upon.
 - Managing and maintaining communication to foster a positive relationship with you.
 - Internal business functions, including business and disaster recovery, document retention/archiving, IT service continuity, and ensuring service quality.
 - Corporate transactions.
 - Marketing analytics for campaign optimization and web analytics to enhance our products and services.
 - Keeping records current and understanding customer usage patterns.
 - Developing products and services, business growth, and communicating our marketing strategy.
 - Defining customer types for our offerings and maintaining website and platform consistency.
 - Analysing portfolios to enhance the products and services provided to customers.

We are committed to assisting you in understanding the specific legal basis applicable to the processing, particularly regarding whether providing personal information is a statutory or

contractual requirement, or a prerequisite for entering into a contract.

How long will we keep it?

We securely maintain your personal information in both electronic and/or paper formats for the duration of your customer relationship with us and for a minimum of three years following the termination of this association. It's important to note that, in adherence to anti-money laundering and terrorist financing laws, specific personal details must be retained for a seven-year period. This includes:

- Name, Family Name, Paternal Name (if any)
- Home Address
- Age/Date of Birth
- Passport Information
- Photographs of documents establishing your identity
- Information regarding deposits to and withdrawals from your account, including currency and amounts
- Details of your trading activities
- Telephone number
- Email address
- History of communications with the customer service department (chats/emails/calls)

Furthermore, this information is stored to safeguard our legal claims within the legally permissible limitation period. Rest assured, the aforementioned personal information is encrypted and securely stored in our IT systems. Its usage is confined strictly to the purposes stated above, and it is retained for the mandated seven-year duration, after which it is promptly removed from our systems. Importantly, access to this personal information is restricted throughout the entire storage period.

What is a Cookie and why do we use it?

A cookie is a small text file stored on your device by a website you visit. It enables the website to remember your actions and preferences (such as login, language, and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

Pleasing Golden uses cookies to:

- Enhance and personalize your user experience.
- Remember your preferences and login details.
- Analyze how our website is used, helping us to make improvements.
- Ensure our website's security and privacy safeguards are robust.

Types of Cookies Used by Pleasing Golden:

- **Session Cookies:** These are essential for the proper functioning of our website and are automatically deleted when you close your browser. They help secure your access and navigate through our site efficiently.
- **Analytical Cookies:** These cookies collect information about how you use our website, such as which pages you visit most often. This data helps us optimize our website and make it easier for you to navigate. They are retained for varying periods, depending on their purpose.
- **Functional Cookies:** These remember your preferences (like your language or region) and provide enhanced, more personal features. For example, they can be used to remember your login details, ensuring you don't have to log in every time you visit.
- **Third-party Cookies:** We partner with third-party services that may set cookies on your device on our behalf when you visit our site. These cookies enable us to provide interactive content, share content on social media platforms, and analyze website traffic and performance.

Managing Cookies

You have the right to decide whether to accept or reject cookies. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website, though your access to some functionality and areas may be restricted.

Contact Us

For more information about our cookie policy or if you have any questions, please feel free to contact our support team at support@pleasinggolden.com. We are here to ensure your trading experience is smooth, secure, and tailored to your needs.

How Can You Get More Help?

At Pleasing Golden, we are dedicated to maintaining transparency and trust in all our interactions. Should you have any questions or require assistance with our Privacy Policy, we are here to help. Please don't hesitate to reach out to us through our dedicated support channel:

Email: support@pleasinggolden.com

We understand the importance of your personal information and take any concerns regarding its use very seriously. If you have any dissatisfaction or concerns about how we collect, share, or utilize your personal data, we urge you to let us know. Our commitment is to work with you to address and resolve any issues promptly and respectfully.

Your Privacy Rights Explained

Understanding your rights concerning your personal information is paramount. Below is a detailed explanation of your rights as a valued client of Pleasing Golden.

To exercise any of these rights, or if you have any questions about your privacy rights, please contact us directly at support@pleasinggolden.com

Accessing Your Personal Information:

When Can You Request Access?

At Pleasing Golden, we empower you with the right to understand how your personal information is handled. You are entitled to:

- Verify whether we process your personal information.
- Access the personal information we hold about you.

You can request access to both paper and electronic records relating to your personal information that Pleasing Golden holds, shares, or uses. To efficiently process your request, we may require proof of your identity and sufficient details to help us locate the specific information you seek.

When Will Access Not Be Provided?

Our commitment to privacy extends to ensuring that your personal information is protected and only shared where legally permissible. As such, there are circumstances under which access to your personal information may be restricted:

- **Privacy of Others:** Access to personal information will be limited if it pertains to another individual whose rights might be compromised.
- **Legal Privilege:** In instances connected to claims or legal proceedings, the principle of legal privilege may prevent us from providing access to certain information.

It's essential to be precise in your request for access to personal information. Should your request be unclear, we may contact you for further clarification to accurately address your needs.

Correcting Your Personal Information:

How Can You Correct Your Personal Information?

Pleasing Golden acknowledges your right to have inaccurate personal information rectified promptly. If you believe any of the personal information we hold about you is incorrect, we encourage you to inform us. Upon receiving your claim, we will review the disputed information. If we agree that a correction is warranted, we will update our records accordingly. If there's a disagreement regarding the accuracy of your personal information, we will notify you of our stance. Nonetheless, you have the option to submit a written statement disputing our records, which we will then attach to your personal information in any external disclosures.

Moreover, should your personal information be incomplete, you possess the right to have it completed, possibly through a supplementary statement. The appropriateness of completing the information varies, depending on its intended use.

We also commit to informing any third parties with whom we've shared your personal information about your request for correction, taking reasonable steps to ensure they update their records. However, if contacting these third parties proves impractical or

requires a disproportionate effort, we may not be able to guarantee that they will correct your information.

What are the Limitations on Accessing and Correcting Your Personal Information?

While we strive to provide full access to and correction of your personal information upon your written request, certain limitations may apply:

- **Legal Privilege:** There may be instances where we're unable to disclose information learned in connection with legal claims or proceedings due to legal privilege.
- **Operational Limitations:** While we will endeavor to correct any inaccuracies in your personal information, notifying third parties of these corrections may not always be feasible if it involves undue effort or is operationally impractical.

Erasing Your Personal Information at Pleasing Golden:

When Can You Request Erasure?

At Pleasing Golden, we respect your right to privacy and control over your personal information. You may request the erasure of your personal information from our systems under the following conditions:

- The personal information is no longer necessary for the purposes for which it was collected or processed.
- You withdraw your consent on which the processing is based, and there is no other legal ground for the processing.
- You object to the processing and there are no overriding legitimate grounds for us to continue processing your information.
- Your personal information has been unlawfully processed.
- The personal information must be erased to comply with a legal obligation.

To initiate a request for erasure, please contact us at support@pleasinggolden.com, clearly stating your request.

When Can Erasure Requests Be Refused?

While we aim to respect your right to privacy, there are circumstances under which your request for erasure may be refused, including:

- When retaining the personal information is necessary for compliance with a legal obligation or for the establishment, exercise, or defence of legal claims.
- If the erasure request jeopardizes the provision of our services to you, affecting your access to our offerings.

Notifying Third Parties of Your Erasure Request

If your personal information has been shared with third parties, we will inform them of your request for erasure, where feasible. We commit to taking reasonable steps to ensure these third

parties are notified; however, in cases where this is not possible or requires a disproportionate effort, we may not be able to guarantee that all third parties will erase your personal information.

Additionally, there may be situations where the recipient is not obligated or able to comply with your erasure request due to one of the exceptions mentioned above.

Restricting Processing of Your Personal Information at Pleasing Golden

When Is Restriction Available?

At Pleasing Golden, we recognize your right to restrict the processing of your personal information under certain conditions for your peace of mind and protection. You may request a restriction on the processing of your personal information in the following scenarios:

- **Accuracy of Data:** If you contest the accuracy of your personal information, processing will be restricted until we can verify the accuracy of your data.
- **Unlawful Processing:** When the processing is unlawful, and you prefer restricting the use of your data over its erasure.
- **Necessity for Legal Claims:** If we no longer need your personal information but you require it to establish, exercise, or defend a legal claim.
- **Objection to Processing:** If you have objected to processing based on our legitimate interests, processing will be restricted until it is determined whether your interests override ours.

Notifying Third Parties of the Restriction

Should there be a need to restrict the processing of your personal information, Pleasing Golden commits to informing any third parties who have received your personal information about the restriction, to ensure that they do not continue processing your data.

We will endeavor to notify relevant third parties in a timely manner; however, in situations where this is not feasible or would involve a disproportionate effort, we may not be able to inform all such third parties. Pleasing Golden will also inform you before lifting any restriction on the processing of your personal information.

How to Request a Restriction

If you believe that restricting the processing of your personal information is necessary under the conditions mentioned, please reach out to us at support@pleasinggolden.com. Our team is dedicated to addressing your concerns and will guide you through the process of implementing a restriction, as applicable.

Taking Your Personal Information with You - Data Portability at Pleasing Golden:

When Does the Right to Data Portability Apply?

Pleasing Golden recognizes your right to data portability, which allows you to receive the personal information you have provided to us in a structured, commonly used, and machine-readable format, and to transmit those data to another controller without hindrance from us. This right applies under the following conditions:

- The personal information is provided by you to Pleasing Golden.
- The processing of your personal information is based on your consent or necessary for the performance of a contract.
- The processing is carried out by automated means.

When Can Requests for Data Portability Be Refused?

While we strive to accommodate your data portability requests, there are circumstances under which these requests may be refused, specifically if:

- The processing does not meet the eligibility criteria outlined above.
- The personal information encompasses data about more than one individual, and transferring your data would adversely affect another person's rights.

Pleasing Golden is committed to ensuring that your data portability requests are handled efficiently and in accordance with relevant data protection laws.

Objecting to Processing of Your Personal Information at Pleasing Golden:

Circumstances Under Which You Can Object:

At Pleasing Golden, we respect your privacy and give you control over your personal information. You have the right to object to the processing of your personal information in the following situations:

- **Legitimate Interests:** You can object to the processing of your personal information if it is being processed on the basis of legitimate interests. You must specify grounds related to your particular situation. Upon receiving your objection, we will review the processing activity in question. If we cannot demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if we are processing your personal information for the establishment, exercise, or defense of legal claims, we will cease processing your personal information.
- **Direct Marketing:** If you are receiving direct marketing communications from us, such as newsletters or promotional emails, and wish to opt out, you can do so at any time and free of charge. To unsubscribe from our direct marketing efforts, please contact us directly at support@pleasinggolden.com, and we will promptly remove you from our distribution lists.

Exercise Your Right to Object

To object to the processing of your personal information, or to opt out of direct marketing communications, please send your request to support@pleasinggolden.com. Include detailed information about your specific objection so that we can address it accurately and efficiently.

Legal information:

This privacy statement has been prepared based on provisions of multiple legislations.

Key Definitions:

Personal Information (or Data)

Personal Information refers to any data that, either on its own or when combined with other pieces of information, enables the identification of a natural person. This could be anything from a name, an identification number, location data, an online identifier, or factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

Usage Data

Usage Data is information that our application, website, or services utilized by us collect automatically. This includes, but is not limited to, details such as your device's Internet Protocol (IP) address, browser type, browser version, our website's pages that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, and other diagnostic data. When accessed through or used by our application and/or website, Usage Data may also track the sequence of pages you visit and the overall pattern of your usage.

- **IP Addresses/Domains:** The unique identifier assigned to your device, which can indicate your device's location and point of access to the Internet.
- **URI Addresses (Uniform Resource Identifier):** A string of characters used to identify a name or a resource on the Internet.
- **Server Response Codes:** Numerical codes provided by a server in response to a request, indicating the status of the request (e.g., success, error).
- **Browser/OS Features:** Information about the browser and operating system you are using, including version and language.
- **Visit Details:** Data on how you interact with our site or app, such as time spent on pages and the navigation path through our site or app.

These definitions are integral to understanding how Pleasing Golden collects, uses, and manages your data, ensuring we maintain a transparent relationship with you, our valued user.