



livemarkets.com

PRIVACY POLICY

LIVEMARKETS

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1. INTRODUCTION

TradeAsia Capital Limited ("**the Company**" or "**we**") operates the website www.livemarkets.com ("**the Website**") and the www.livemarkets.com mobile application ("**the App**"; collectively and separately known as "**the Service**").

This Privacy Notice Policy ("Privacy Notice") is issued pursuant to and reflects compliance with the requirements and/or obligations and/or duties introduced by the EU General Data Protection Regulation 2016/679 ("GDPR"), as amended and replaced from time to time, the e-privacy Directive 2002/58/EC as amended and replaced by the Directive 2009/136/EC, as amended and replaced from time to time (collectively referred to as the "Data Protection Laws"), in regards with any and all Personal Data or Information ("Personal Data" or "Data") processing activities carried out by the Company.

2. SCOPE AND OBJECTIVE OF THE PRIVACY NOTICE

The Company respects individuals' rights to privacy and the protection of Personal Data. The scope of this Privacy Notice is to explain and elaborate on how we collect, use, process and store Personal Data in the course of our business.

Personal Data means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This Policy is a legally binding agreement between you ("**you**" or "**user**") and us. By visiting, accessing, or using the Website or App, or providing information to us in any other format, you agree to and accept the terms of this Privacy Policy, as amended from time to time, and you consent to the collection and use of information in the manner set out in this Policy. We encourage you to review this Policy carefully and to periodically refer to it so that you understand it and its subsequent changes if any. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE STOP USING THE SERVICE IMMEDIATELY AND WHERE RELEVANT UNINSTALL.

3. THE PERSONAL DATA WE PROCESS

(1) Non-Personal Information - We retain some non-personally identifiable information ("**Non-Personal Information**"), such as your approximate geo-location, your web request, browser type, browser language, web pages you visit before or after visiting our Website or using the App, URLs, platform type, click numbers, landing pages, viewed pages and the order of those pages and time spent on pages. This information is collected and retained for security reasons and so that we can audit and statistically track usage, audit our affiliates, and calculate payments to third parties.

"Cookies" - Non-Personal Information is collected, inter alia, through the use of cookies, so when accessing or using the Website, we may use one or more cookies. Cookies are small text files, placed on a user's device, which enable a website to remember user preferences. Detailed information about cookies and how we use them on the Website and other websites implementing our web tools may be found in our [Cookies Policy](#), which also describes how you can turn off cookies or control them.

(2) Personal Information - "**Personal Information**" is information that may be of a private or sensitive nature, including your name, gender, phone number, e-mail address or mailing address, payment information and IP address. We collect your IP address as part of your use of the Service. We also collect the following Personal Information from you when you create an account ("**Account**") on the Website which is required to access certain parts of the Service: your full name, email address, password, and phone number.

You are not required to provide us with this information in order to use the service. If you choose to provide us with this information, we will retain it in our records and process it only in accordance with the provisions of this Privacy Policy.

We treat any Non-Personal Information which is specifically connected or linked to any Personal Information as Personal Information.

We collect and process the Personal Information referred to above based, where applicable, on your consent, where the processing is necessary for the performance of a contract between you and the Company or where the processing is necessary for the purpose of fulfilling a legitimate interest pursued by us.

4. HOW PERSONAL DATA IS COLLECTED

Your Personal Data is collected:

- i. From you;
- ii. From third parties – including subsidiaries or sister companies of the Company, third parties who provide services to you or us, established or located within and/or outside the EEA;
- iii. During our business relationship with you in case you have an Account.
- iv. From the technology that you use to access our services including location data from your mobile phone, or an IP address or telephone number and how you use it;
- v. From publicly available sources including the press, company registers and online search engines whatsoever.

It is your duty and responsibility to provide us with updates as to the Personal Data provided in order for such Data to remain current, accurate and correct and you acknowledge that we rely on the Personal Data provided to us in carrying out our obligations, under the law and our business relationship with you.

5. PURPOSE OF COLLECTING PERSONAL INFORMATION

We would like to ensure that you fully understand the purpose and the legal basis of collecting, using, processing, and storing of your Personal Data. Thus, in this Section we will describe the purposes for which your Personal Data may be used as well as the legal basis of processing of your Personal Data.

In order to access our services, users may be asked to fill in a form, providing some personal information to the Company. Answers to questions on Personal Information are not mandatory unless the fields are marked with an asterisk. Provision of the information requested in the optional fields of the registration form is not mandatory in order to receive the services and information that we provide through the Site (unless otherwise indicated in the registration form). However, failure to complete mandatory fields or providing incorrect Personal Information may prevent us from fully providing the requested information or services. Please note that you are under no legal obligation to provide us with your Personal Information, however you may not be able to enjoy our services or access the Site if you fail to do so.

The collection and processing of Personal Information is aimed at providing you with the Service (including setting up your account), to send you marketing offers on products or services we think may be relevant to you, and to fulfil other purposes as provided in this privacy policy.

Non-Personal Information is collected for research and statistical purposes, to enable us to develop, customize and improve the Service, based on your preferences, usage, and interactions with the Service, to process your requests for information, and to provide you with the most relevant services and offers.

We use cookies in conjunction with third parties to collect user information. Your Personal Information is collected to enable us to provide you with features, capabilities, offers and marketing materials we or our marketing partners think you may be interested in.

In addition to the above, your Personal Information allows us to provide you with technical assistance and support.

Company only collects and processes Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized. As a general matter, for all categories of data we collect, we may use the information we collect (including Personal Information, to the extent applicable) to:

- provide, operate, maintain, improve, and promote the Service;

- enable you to access and use the Service;
- send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages;
- send commercial communications, in accordance with your communication preferences, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions and events about us and our partners; and send other news or information about us and our partners.
- monitor and analyze trends, usage, and activities in connection with the Service and for marketing or advertising purposes;
- comply with legal obligations as well as to investigate and prevent fraudulent transactions, unauthorized access to the Services, and other illegal activities;
- personalize the Service, including by providing features, content or ads that match your interests and preferences; and
- process for other purposes for which we obtain your consent.

6. YOUR RIGHTS

The Company takes all the appropriate measures to make sure that you are fully informed about your rights in regards with all Personal Data we collect, process, use and store.

In the event you wish to exercise any of the rights described below or if you have any queries about how we collect, use, process or store your Personal Data that are not answered in this Privacy Notice, or if you wish to complain to our Data Protection Officer, please contact us at info@livemarkets.com.

Please note that in some cases, if you do not agree to the way we collect, use, process or store your Personal Data, it may not be possible for us to continue providing you with our Services.

Please note that the following rights specifically apply regarding your personal information: (1) Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information; (2) Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format; (3) Request rectification of your personal information that is in our control; (4) Request erasure of your personal information; (5) Object to the processing of personal information by us; (6) Request to restrict processing of your personal information by us; (7) Lodge a complaint with a supervisory authority.

7. CHANGES TO THE WAY WE USE PERSONAL DATA

The Company reserves the right to change the way and/or the purpose of processing and use of your Personal Data.

As a result, where the Company decides to process or use your Personal Data for purpose other than the purpose for which such Personal Data were initially collected, processed, and used and stored, it shall provide you with all relevant information of such change including the new purpose under which such Personal Data will be used and/or processed as well as all of your rights.

Please note that if you do not agree to such changes of processing your Data, we may have to suspend the operation of your account and/or the services and/or products provided to you.

8. WHO ELSE RECEIVES THIS INFORMATION?

We may share or transfer information, including Personal Information, internally within our group of companies, for the purposes outlined above. These companies may be located in countries that may provide a different level of protection of privacy than in your jurisdiction.

We also share Personal and Non-Personal Information with trusted third parties, when this is required in order to provide, maintain, or improve our services and operation. This is the case with third party advertisements and affiliates; we share your information with third parties for the purpose of providing you with advertisements and offers we or third parties think you may be interested in. These third parties may be located in countries that may provide a different level of protection of privacy than in your jurisdiction.

We share your Personal and Non-Personal Information with (i) third parties which provide services to the Company in order to allow or enable us to provide you with our Service, including analytics, email services providers and data verifiers; (ii) third parties who provide the Company services in relation to the operation of the Website; (iii) any auditors, contractors or other advisers auditing any of the Company's business processes; and (iv) any potential purchasers or investors in the Company.

If you have chosen to share Personal Information with us through one of our forms, we may share it with any or all of our third party providers. Please note that this third party may be considered a "controller" of your Personal Information and the processing of such Personal Information will be subject to such provider's privacy policy.

Any processing performed by any of our third party service providers ("Recipients") will, where required by law, be governed by a data processing agreement in the form required by law, preserving any and all of your statutory data protection rights and obligating the Recipients to respect the Personal Information and handle it in accordance with the relevant laws. If a Recipient is located outside the EEA, we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection or ensure that the legal agreements governing the data transfer provide an adequate level of data protection. The Recipients are required to maintain the confidentiality of such information and to use your Personal Information only in the course of providing the aforementioned services and only for the purposes that the Company dictates.

We may also share your Personal Information and other information in special cases if we have a good reason to believe that it is necessary to: (i) comply with law, regulation, subpoena, request by an applicable authority or court order; (ii) detect, prevent or otherwise address fraud, security, violation of our policies or technical issues; (iii) enforce the provisions of this Privacy Policy or any other agreements between you and the Company, including investigation of potential violations thereof; or (iv) protect against harm to the rights, property or safety of the Company, its partners, its affiliates, users or the public.

9. ADVERTISEMENTS

We may use a third-party advertising technology to serve advertisements when you access the Site. This technology uses your information with regards to your use of the Services to serve advertisements to you (e.g., by placing third-party cookies on your web browser).

10. MARKETING

We may share your full name, email address and phone number with certain broker(s) (the "Broker") in the event that you have granted permission to receive promotional materials from such Broker at the time of registration. The Broker may periodically use your full name, email address and phone number for the purpose of providing you with promotional materials if your permission was granted at the time of registration and you have not unsubscribed at a later time in accordance with the provisions hereof. At any time, you may request to discontinue receiving these offers or Company's marketing emails by clicking on the unsubscribe link in the email's footer. If you unsubscribe, we will remove your full name, email address and phone number from our marketing distribution lists and from any future lists we may share with the Broker. However, you may need to also unsubscribe from marketing offers separately sent by the Broker. Please note that in order to send you promotional materials, the Broker may assign you with a username and password which will allow you access to the Broker's site through an account. You may contact the Broker at any time to remove the account.

11. HOW LONG WE STORE YOUR DATA

We will store your Personal Data for as long as it is required for legal or business purposes.

12. COOKIES POLICY

Cookies are small packages that a website stores on your computer or any other electronic device when you visit a website to enable you to perform numerous functions on the website as well as to regulate the content to your preferences. As a result, the Company uses cookies to ensure that the performance and the functionality of its website is robust and enhanced. Please visit our website to read our Cookies Policy.

13. SECURITY INFORMATION

We are committed to ensuring that your Personal Data is secure with us and with the third parties who act on our behalf. For more information about the steps, we are taking to protect your Personal Data please contact us at info@livemarkets.com,