



# 26 Degrees Global Markets Privacy Policy

26 Degrees Global Markets (EU) Ltd

(Regulated by the Cyprus Securities and Exchange  
Commission) CIF License No. 435/23

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## PRIVACY POLICY

### 1. Introduction

This document is the Privacy Policy Statement (the "Policy") of 26 Degrees Global Markets (EU) Ltd (hereinafter the "Company" or "26 Degrees Global Markets"). It outlines how 26 Degrees Global Markets collects, processes, uses and protects your personal data when one or more of our entities deal with you and/or when you access our website and/or use our trading platform.

26 Degrees Global Markets respects your privacy and is committed to protecting your personal data. This Policy informs you about your privacy rights, how we look after your personal data, and how the law protects you.

For the purpose of this Policy, the following definitions shall apply:

- Personal data shall be mean any information relating to you which identifies or may identify you as defined in Regulation (EU) 2016/679 ("GDPR"). Through this Policy, your data may be referred to as "personal data" or "personal information".
- Affiliate shall mean any undertaking being a member of our Group, a representative whom we or another undertaking of our Group appoint, or any other person with whom we have a contractual or other relationship that might reasonably be expected to give rise to an interest between us and them.
- Group shall mean 26 Degrees Global Markets and any entity controlled by or controlling 26 Degrees Global Markets and entities under common ownership and control with 26 Degrees Global Markets.

### 2. Who We Are

26 Degrees Global Markets (EU) Ltd is a licensed Cyprus Investment Firm, regulated by the Cyprus Securities and Exchange Commission ("CySEC") under license number 435/23, with its registered office at Viewpoint Building, 4th floor, 28th October Avenue, Limassol, Cyprus.

### 3. Purpose of this Privacy Policy

This Policy aims to give you information on how 26 Degrees Global Markets collects and processes your personal data through your use of this website, including any data you may provide through this website when you apply for a Trading Account.

It is important that you read this Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other notices and is not intended to override them.

### 4. Personal Data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Verification Data includes copies of your identification card, passport or driver's license.
- Financial Data includes bank account and payment card details.

- Transaction Data includes details about payments to and from you.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Any other data needed from 26 Degrees Global Markets to perform its statutory, regulatory or legal obligations. We may also collect and process personal data which we lawfully obtain not only from you but also from other entities within the Group and/or affiliated entities or other third parties e.g. public authorities, companies that introduce you to us and other publicly available sources which we lawfully obtain, and we are permitted to process.

## 5. How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by contacting us at the following email: [compliance@26degreesglobalmarkets.eu](mailto:compliance@26degreesglobalmarkets.eu)

## 6. Purposes for which we will use your Personal Data

For the performance of a contract

26 Degrees Global Markets processes personal data in order to offer financial services based on contracts with you but also to be able to complete our acceptance procedure so as to enter into a business relationship with prospective customers.

### For Identity Verification purposes

26 Degrees Global Markets needs to perform its due diligence measures and apply the principles of KYC (Know-Your-Client) before entering a client relationship in order to prevent actions, such as money laundering or terrorist financing, and also to perform other duties imposed by law. Therefore, we collect from our clients' identity verification information (such as images of your government issued national ID card or International Passport, or driving licence or other governmental proof of identification, as permitted by applicable laws) or other authentication information. 26 Degrees Global Markets are also requesting to provide us with a recent Utility Bill in order to verify their address. Further to this, 26 Degrees Global Markets can use third parties which carry out identity checks on its behalf.

### For compliance with a legal obligation

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements. There are also various supervisory authorities whose laws and regulations we are subject to.

Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. These include amongst others transaction reporting requirements, assessment of the clients' knowledge and experience, FATCA and CRS reporting.

#### **For the purposes of safeguarding legitimate interests**

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

- Initiating court proceedings and preparing our defence in litigation procedures
- Means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures
- Measures to manage business and for further developing products and services
- Sharing your personal data within the Group for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework

#### **For Marketing Purposes**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You may receive marketing communications from us if you have requested information from us, purchased services from us, or if you provided us with your details when you entered our website for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

### **7. Third-Party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **8. Opting Out**

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links on any marketing message sent to you, or by Contacting us at any time at the following email address: [compliance@26degreesglobalmarkets.eu](mailto:compliance@26degreesglobalmarkets.eu)

### **9. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## 10. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the following email: [compliance@26degreesglobalmarkets.eu](mailto:compliance@26degreesglobalmarkets.eu).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 11. With whom do we share your Personal Data

In the course of the performance of our contractual and statutory obligations, your personal data may be provided to various departments within 26 Degrees Global Markets but also to other companies of the Group and other Affiliates. Various service providers and suppliers may also receive your personal data so that we may fulfil our obligations. Such service providers and suppliers enter into contractual agreements and appropriate arrangements with 26 Degrees Global Markets by which they observe confidentiality and data protection according to the data protection law and GDPR.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

It must be noted that 26 Degrees Global Markets may disclose data about you for any of the reasons set out herein above, or if we are legally required to do so, or if we are authorised under our contractual and statutory obligations or if you have given your consent.

Under the circumstances referred to above, recipients of personal data may be:

- Supervisory and other regulatory and public authorities, notary offices, tax authorities, criminal prosecution authorities as much as a statutory obligation exists.;
- Credit and financial institutions such as banks, payment systems and processors, institutions participating in the trade execution and execution venues (for example regulated markets, multilateral trading facilities, trade repositories and other local or foreign brokers)
- External legal consultants authorised by 26 Degrees Global Markets
- Financial and business advisors authorised by 26 Degrees Global Markets
- Auditors and accountants authorised by 26 Degrees Global Markets
- Marketing and advertising agencies
- Fraud prevention agencies
- File storage companies, archiving and/or records management companies, cloud storage companies
- External authorised processors for processing client data
- Debt collectors subject to bankruptcy or insolvency claims
- Potential or actual purchasers and/or transferees and/or assignees and/or charges of any of the Company's benefits, rights, title or interest under any agreement between the customer and the Company, and their professional advisers, service providers, suppliers and financiers.
- Any members of the Group, which shall mean any of the ultimate holding companies and their respective subsidiaries.

## 12. If you fail to provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## 13. International Transfers

For the purposes of carrying out our services, we may need to on certain occasions transfer your personal data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

## 14. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed or used/accessible in an unauthorized way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 15. How long do we retain your Personal Data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting or record-keeping requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we must keep your personal information (including Contact, Identity, Financial and Transaction Data) for at least seven (7) years after you cease being 26 Degrees Global Markets customers for regulatory purposes.

## 16. Your Legal Rights

Under certain circumstances, you have rights under GDPR in relation to your personal data:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law.

Please note however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In these cases, we may demonstrate that we have compelling legitimate grounds to continue processing your information.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please Contact us:

Att: DPO  
 Email: [compliance@26degreesglobalmarkets.eu](mailto:compliance@26degreesglobalmarkets.eu)  
 Tel: +357 25030938

## 17. Your right to lodge a complaint

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by sending an email to [compliance@26degreesglobalmarkets.eu](mailto:compliance@26degreesglobalmarkets.eu)

You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Instructions as to how to submit a complaint can be found in their website: [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)

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