

PRIVACY POLICY

This privacy policy relates solely to our [website](#), if not stated otherwise within this document.

This privacy policy outlines how we collect, use, and protect your personal information when you use our services.

1. Definitions and legal references

1.1. Personal data (or data)

Any information that is directly, indirectly, or in connection with other information including a personal identification number allows for the identification or identifiability of an individual person.

1.2. Usage data

Usage data is information automatically collected through our website or third-party services, including your IP address, browser type, operating system, time and method of requests, response status, visit duration, page sequence, and device-specific details.

1.3. This website

The means by which your personal data is collected and processed.

1.4. Service

The service provided by our website is described in the Terms of Service and on this site.

1.5. Cookie

Cookies are trackers consisting of small sets of data stored in your browser.

1.6. Tracker

Tracker indicates any technology - e.g. cookies, unique identifiers, web beacons, embedded scripts, e-tags that enables the tracking of you, for example by accessing or storing information on your device.

2. Introduction

2.1. This document explains how our [website](#) collects, uses, and protects your personal data to achieve the purposes outlined in this document.

2.2. Personal data refers to information that can be used to identify you directly or indirectly. This includes details such as first name, last name, email address, tracking technologies (like cookies or tracking pixels), user activity, and device information.

You can find detailed information on each type of personal data collected in dedicated sections of this privacy policy or in text shown before data is collected.

2.3. Contact Information

Address: 1257, Bonovo Road, Fomboni, Comoros, Island of Moheli

Email: compliance@trade24seven.com

Phone: +55 1146806351

3. Types of data collected

3.1. The types of personal data that we collect, by itself or through third parties, may include:

- First name;
- Last name;
- Email address;
- Trackers;
- Usage data

3.2. Complete details on each type of personal data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the data collection. Personal data may be freely provided by you, or, in case of Usage data, collected automatically when using this [website](#). Unless specified otherwise, all data requested by this website is mandatory and failure to provide this data may make it impossible for this [website](#) to provide its services.

3.3. In cases where this website specifically states that some personal data is not mandatory, you are free not to communicate this data without consequences to the availability or the functioning of the service.

3.4. Any use of cookies or of other tracking tools by our [website](#) or by the owners of third-party services used by this website serves the purpose of providing the service required by you, in addition to any other purposes described in the present document.

You are responsible for any third-party personal data obtained, published or shared through this [website](#)

4. Mode and place of processing personal data

4.1. Methods of processing

We take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

In certain cases, the data may also be accessible to authorized personnel involved in the operation of this website, such as members of the administration, sales, marketing, or legal teams.

The data may also be accessible to external parties appointed, if necessary, as data processors by us.

The updated list of these parties may be requested by us at any time by contacting us at the contact details provided in this document.

4.2. Place

The data is processed at our operating offices and in any other places where the parties involved in the processing are located. Depending on your location, data transfers may involve transferring your data to a country other than your own. To find out more about the place of processing of such transferred data, you can check the section containing details about the processing of personal data.

4.3. Retention time

Unless specified otherwise in this document, personal data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on your consent but not more than 5 (five) years.

4.4. Detailed information on the processing of personal data

Your personal data is collected to allow us to provide our service, comply with our legal obligations, respond to enforcement requests, protect our rights and interests (or yours or those of third parties), detect any malicious or fraudulent activity, as well as the purposes set out below.

4.5. Analytics

The services contained in this section enable us to monitor and analyze web traffic and can be used to keep track of your behavior.

4.6. Google Analytics (Universal Analytics)

We use Google Analytics (previously known as Universal Analytics), a web analytics service provided by Google LLC, to help us understand how users interact with our website. Google collects data such as your IP address, device information, and browsing behavior on our site through the use of cookies and similar technologies.

This information is used to compile reports and improve website performance. Google may also use the collected data to personalize ads within its advertising network.

To learn more about how Google uses your data, please review:

[Google's Partner Policy](#)

[Google Business Data Privacy](#)

You can opt out of Google Analytics tracking by visiting:

<https://tools.google.com/dlpage/gaoptout>

Categories of personal information collected:

According to the California Consumer Privacy Act (CCPA), this may include “internet or other electronic network activity information.”

Note: This type of data sharing may be considered a “sale” or “sharing” under applicable laws such as the CCPA, VCDPA, CPA, CTDPA, and UCPA.

4.7. Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this website and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow user interaction. This type of service might still collect web traffic data for the pages where the service is installed, even when you do not use it.

4.8. Google Fonts

Our website uses Google Fonts, a service provided by Google LLC, to enhance the visual appearance of our site by displaying custom fonts. When you access our website, your browser may load font files directly from Google's servers, which may result in Google collecting certain data such as your IP address and browser information.

For more information on how Google handles this data, please visit:

[Google's Partner Sites Policy](#)

[Google Business Privacy](#)

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You may also review Google's opt-out options at: <https://tools.google.com/dlpage/gaoptout>

Categories of personal information collected:

Under the California Consumer Privacy Act (CCPA): "Internet or other electronic network activity information."

4.9. Contacting Us via Contact Form

If you contact us through our website's contact form, we collect the personal data you provide, including your name, email address, and any other information you include in your message. This data is used solely to respond to your inquiry, provide you with requested information or quotes, and follow up as necessary.

Personal data processed:

- First name
- Last name
- Email address

Legal basis for processing (if GDPR applies): Consent or legitimate interest.

Categories of personal information collected under the CCPA:

Identifiers (e.g., name and email address)

Please note: This processing may constitute a "sale" or "sharing" of personal information as defined under applicable privacy laws, including the CCPA, VCDPA, CPA, CTDPA, and UCPA.

5. Further information

5.1. Legal basis of processing

We may process personal data relating to you if you have given your consent for one or more specific purposes:

- provision of data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which we are subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us;
- processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

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In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

6. Understanding how long we have to keep your information

6.1. When we collect your personal information, we keep it for as long as required for the purposes we collected for. Sometimes, we might need to keep our personal information longer due to a legal obligation or based on your consent, however it won't be more than 5 (five) years.

6.2. Here's what that means in more detail. We will keep your personal information based on the purposes and reasons set out below:

- For contractual purposes: If we have concluded a contract with you, then we'll keep your information until the contract has been performed in full.
- For our legitimate interests: If we're using your personal information for purposes that are necessary and relevant to our business operations, we'll keep it as long as we need it for those purposes. You can learn more about these purposes within the relevant sections of this document or by contacting us.
- With your consent: We may be allowed to retain personal data for a longer period whenever you have given consent to such processing, unless you withdraw your consent.
- Legal obligations: we may be obliged to retain personal data for a longer period whenever required to fulfill a legal obligation or upon order of an authority.

6.3. Once the retention period expires, we permanently delete, anonymize, or aggregate personal data. After deletion, rights such as access, rectification, or portability cannot be enforced. However, where retention is required by AML laws or financial regulations, user requests for deletion may not override these legal obligations.

7. Your Rights Under Data Protection Laws

You have rights regarding your personal data under applicable data protection laws.

7.1. Subject to local laws, you may exercise the following rights:

- Withdraw your consent: You may withdraw your consent to the processing of your personal data at any time, where consent was the legal basis for processing.
- Access your data: You have the right to confirm whether we process your personal data and to access that data.

- Rectify your data: You can request correction or updating of incomplete, inaccurate, or outdated information.
- Request deletion, blocking, or anonymization: If your data is unnecessary, excessive, or not being processed in compliance with applicable laws, you may request that it be anonymized, blocked, or deleted.
- Data portability: Where applicable, you may request the transfer of your personal data to another provider.
- Request deletion of data processed on the basis of consent: You may request deletion of data processed solely with your consent, unless we are legally required to retain it.
- Know about third-party data sharing: You may request information about the public or private entities with whom we share your data.
- Object to processing: You may object to the processing of your data for direct marketing, profiling, or other purposes based on your specific situation.
- Understand the consequences of not providing consent: Where the provision of data is optional, you are entitled to be informed about the consequences of not providing consent.

7.2. We are committed to respecting your privacy rights and complying with applicable data protection laws in all jurisdictions where we operate.

8. How to exercise these right

8.1. Any requests to exercise your rights can be directed to us. Our full contact details can be found at the start of this document.

8.2. Such requests are free of charge and will be answered by us as early as possible, providing you with the information required by law.

8.3. Any rectification or erasure of personal data or restriction of processing will be communicated by us to each recipient, if any, to whom the personal data has been disclosed unless this proves impossible or involves disproportionate effort. At your request, we will inform you about those recipients.

9. The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- Your consent to the relevant processing activities;

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- Compliance with a legal or regulatory obligation that lies with us;
- The carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- Studies conducted by research entities, preferably carried out on anonymized personal information;
- The carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- The exercising of our rights in judicial, administrative or arbitration procedures;
- Protection or physical safety of yourself or a third party;
- The protection of health – in procedures carried out by health entities or professionals;
- Our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests.

To find out more about the legal bases, you can contact us at any time using the contact details provided at the start of this document.

10. Your privacy rights

10.1. You have the right to:

- Obtain confirmation of the existence of processing activities on your personal information;
- Access to your personal information;
- Have incomplete, inaccurate or outdated personal information rectified;
- Obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the applicable laws;
- Obtain information on the possibility to provide or deny your consent and the consequences thereof;
- Obtain information about the third parties with whom we share your personal information;
- Obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- Obtain the deletion of your personal information being processed if the processing is based upon your consent;

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- Revoke your consent at any time;
- Oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- Request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- Request the review of decisions made solely on the basis of the automated processing of your personal information, which affects your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

10.2. You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

11. How to file your request

You can file your express request to exercise your rights free of any charge, at any time, by using the contact details provided at the start of this document, or via your legal representative.

12. How and when will we respond to your request

12.1. Prompt responses

We will strive to promptly respond to your requests. In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

12.2. Access or processing confirmation requests

If you file an access or personal information processing confirmation request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form. You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need complete disclosure instead. In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

12.3. Rejection, deletion, anonymization or personal information blocking requests

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If you file a rectification, deletion, anonymization or personal information blocking request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request except in cases where such communication is proven impossible or involves disproportionate effort on our side.

13. Additional information about data collection and processing

13.1. Legal action

Your personal data may be used for legal purposes by us in Court or in the stages leading to possible legal action arising from improper use of our website or the related services. You declare to be aware that we may be required to reveal personal data upon request of public authorities.

13.2. Additional information about your personal data

In addition to the information contained in this privacy policy, our website may provide you with additional and contextual information concerning particular services or the collection and processing of personal data upon request.

13.3. System logs and maintenance

For operation and maintenance purposes, this website and any third-party services may collect files that record interaction with this website (System logs) or use other personal data (such as the IP Address) for this purpose.

13.4. Information not contained in this policy

More details concerning the collection or processing of personal data may be requested from us at any time. Please see the contact information at the start of this document.

13.5. Changes to this privacy policy

We reserve the right to make changes to this privacy policy at any time by notifying you on this page and possibly within this website. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. Should the changes affect processing activities performed based on your consent, we shall collect new consent from you, where required.