



PRIVACY POLICY

Dated: 13 September 2024

1. GENERAL STATEMENT

1.1 ZT Markets Limited (Registration No. 124359), a company incorporated and registered under the laws of the Republic of the Marshall Islands with a registered office at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro MH96960, Republic of the Marshall Islands, hereinafter referred to as the "Company", provides the Zentrader Service to individuals and legal entities ("Clients" or "Client"), excluding stateless persons, individuals under the age of 18, and citizens, residents, or legal entities from countries where the Service is not available, including but not limited to the United States, the European Union, the United Kingdom, Canada, Australia, and any FATF-designated "High-Risk Jurisdictions."

1.2 We understand that your privacy is important, and we are committed to protecting your personal data. This Privacy Policy outlines how we collect, use, store, and safeguard your information.

1.3 By opening an Account with us or using our services, you agree to the collection, use, and disclosure of your personal data in accordance with this Privacy Policy. We encourage you to read it carefully.

2. COLLECTION OF PERSONAL DATA

2.1 We collect personal data for the purpose of providing our services and complying with legal requirements. This data may include:

- a) Information provided during the account application process (e.g., name, email address, phone number, date of birth, identification details, etc.).
- b) Data from transactions carried out through our Service.
- c) Information obtained from third-party services, including consumer reporting agencies.
- d) Data collected via cookies and other tracking technologies used to improve the user experience.

2.2 Cookies: Our website uses cookies to track traffic patterns, measure performance, and improve functionality. Cookies do not identify individuals unless you voluntarily provide personal information, such as when creating an account or signing up our Service. By using our website, you consent to the use of cookies as outlined in this policy.



3. USE OF PERSONAL DATA

3.1 The Company uses personal data to provide, manage, and improve its services. Specific uses include:

- a) Facilitating account creation, identity verification, and Service access.
- b) Processing transactions and managing your Account.
- c) Providing customer service and responding to inquiries.
- d) Sending Service related notifications and updates.
- e) Ensuring compliance with legal obligations, such as anti-money laundering (AML) and counter-terrorism financing (CTF) requirements.

4. SHARING OF PERSONAL DATA

4.1 We do not sell or rent your personal data to third parties. However, in order to deliver services and comply with our obligations, we may share your data with trusted partners under the following conditions:

- a) **Service Providers:** We may share personal data with third-party service providers who assist us in maintaining and operating our Service (e.g., payment processors, IT support). These providers are contractually bound to use your information only as necessary to provide the services they are hired for, and they must adhere to strict confidentiality agreements.
- b) **Affiliates:** Personal data may be shared with affiliates of the Company, provided they uphold similar privacy protections as outlined in this policy.
- c) **Regulatory Authorities and Law Enforcement:** Personal data may be disclosed to comply with legal obligations, including court orders, subpoenas, or other lawful requests. We may also provide information if required by applicable law, to protect our rights, enforce agreements, or prevent unlawful activities. All disclosures are carefully considered and limited to what is necessary to meet these obligations.

5. SECURITY OF PERSONAL DATA

5.1 The Company takes the security of your personal data seriously. We use industry-standard security measures, including encryption, firewalls, and secure authentication processes, to protect your information from unauthorized access, use, or disclosure.

5.2 Access to your personal data is restricted to employees, agents, and service providers who need the information to perform their job duties. All personnel with access to personal data are bound by strict confidentiality obligations.

5.3 While we take significant steps to safeguard your information, no system is completely secure. Therefore, we cannot guarantee the absolute security of your personal data. You are responsible for maintaining the confidentiality of your account details and for notifying us immediately of any unauthorized access to your account.



6. RETENTION OF PERSONAL DATA

6.1 We retain personal data only as long as necessary to fulfill the purposes for which it was collected or to comply with legal or regulatory requirements. This includes maintaining records of transactions and communications for a reasonable period, even after an account is closed.

6.2 Once personal data is no longer needed, it will be securely deleted or anonymized in accordance with applicable legal and regulatory requirements.

7. CLIENT RIGHTS

7.1 Clients have certain rights concerning their personal data, subject to applicable laws. These rights include:

- a) Access: You may request a copy of the personal data we hold about you.
- b) Correction: You have the right to request corrections to any inaccuracies in your personal data.
- c) Deletion: You may request the deletion of your personal data, subject to our legal obligations to retain certain records.
- d) Restriction: You can ask us to restrict the processing of your personal data under certain circumstances.
- e) Objection: You have the right to object to the processing of your personal data in specific situations.

7.2 To exercise any of these rights, please contact our Compliance Department at compliance@zentrader.com. We will respond to your request within a reasonable time, subject to applicable legal requirements.

8. THIRD-PARTY SERVICES

8.1 If you choose to subscribe to or use third-party services that are offered through our Service, your personal data may be shared with the respective service providers. These providers are required to protect your data in accordance with confidentiality agreements and must not use your information for any purpose other than to provide the requested services.

9. AMENDMENTS TO THE PRIVACY POLICY

9.1 We reserve the right to update this Privacy Policy at any time to reflect changes in our practices or applicable laws. Any changes will be posted on our website, and where appropriate, we will notify you of significant updates.

9.2 By continuing to use our Service after changes to the Privacy Policy have been made, you agree to the updated terms.



10. CONTACT INFORMATION

If you have any questions or concerns about this Privacy Policy or our handling of your personal data, please contact us:

Customer Service Department
support@zentrader.com

Compliance Department
compliance@zentrader.com

This Privacy Policy reflects our commitment to protecting your personal information while providing you with secure and reliable services.