

# The Trade Shift Terms & Privacy Policy

## Purpose

The Privacy and Data Protection Policy lays the foundation of the client information, which The Trade Shift (“we,” “us,” or “our”) may gather, manage, and use on our website [www.thetradeshift.com](http://www.thetradeshift.com) (the “Website”), software, applications, and other services that we offer, including the link to where this Privacy Policy is shown. We may also collect client information through other communication with clients, whether written or verbal, such as chat, call, and email.

We are committed to protecting our clients’ rights and privacy under Privacy and Data Protection regulations and practices. Therefore, sufficient security measures are being implemented while our clients use our website and products/services, including:

- [www.thetradeshift.com](http://www.thetradeshift.com)
- The Trade Shift software applications for Windows, iOS, and Android

## Definitions

**Personal Data** – Refers to any information related to a natural individual (“data subject”) who can be personally identified from that information and may include name, gender, date, and place of birth, home address, phone number, and email address, and identification number. It does not include collected, anonymized, and de-identified data.

**Data Processing** – Refers to any operation or set of operations, automated or not, performed on personal data, including but not limited to gathering, documenting, organizing, storing, adapting, using, transferring, distributing, and erasing.

**Restriction of Processing** – Refers to the marking of stored personal data to limit their processing in the future. It serves as an alternative to requesting data erasure.

**Data Controller** – Refers to the natural or legal individual, agency, public authority, or any other entity responsible for determining the purposes and methods of processing the personal data. The controller can be nominated by the Union or Member State law.

Data Processor – Refers to the natural or legal individual, agency, public authority, or any other entity responsible for processing personal data on behalf of the controller.

Consent – Refers to the informed agreement willingly provided by a data subject to the processing of their data by written or verbal means, or by an explicit affirmative action.

## **Collection and Use of Personal Data**

We generally gather personal data from all data subjects that:

- Have been directly provided to us through our website or when inquiring about our products or services.
- We obtain from the use of our products and services via our website.

We may record personal data through different sources, including:

- Website forms and registrations to software applications
- A phone call and email
- Present representative
- Online live support
- Social media
- Advertising counters and identifiers on websites
- Physical forms

We may gather and use personal data for the following reasons:

- Satisfying requirements under a contract or our provision of products and services requested by our client.
- Identity confirmation.
- Responding and addressing questions, requests, applications, and concerns.

- Providing our clients information, including surveys about our products or services.
- Complying with applicable laws and regulations and support law enforcement and investigations performed by a government or regulatory authorities.
- Sending data to any of our affiliates, including third-party service providers, agents, and relevant government or regulatory authorities.

All personal data collected will be used to process and send product/service information and special offers or announcements provided by us. We do not sell, rent, lease or freely disseminate personal data to anyone and only share it with third parties facilitating the delivery of our products and services.

## **Minor's Personal Data and Privacy**

Our website and products, and services are focused on individuals over eighteen (18) years of age. Therefore, we do not collect any personal data from individuals under eighteen (18) and are not accountable for any failure to comply with this condition.

## **Personal Data Protection**

We are committed to safeguarding the data provided to us. Therefore, we implement appropriate administrative, technical, and physical security measures to protect personal data against accidental or illegal forms of processing personal data that we hold. Such measures include firewalls, password protection, and authentication and access control, among others.

However, we cannot guarantee that the personal data in our possession is 100% safe from being accessed, revealed, altered, or deleted by a breach of our technical, administrative, or physical protection. Therefore, we encourage our clients to contact us immediately if they believe their data has been compromised.

In the event we experienced an unauthorized breach in our systems that may affect personal data security, we will inform our clients as soon as possible and take necessary actions to avoid facing the same or similar incident in the future.

## **Personal Data Retention**

We may keep personal data for different reasons as required by law, our legitimate interests, or business practices. In addition, other legal obligations, processes, and inquiries may call for the retention of personal data.

## **Changes to Privacy and Data Protection Policy**

We reserve the right to make occasional revisions and updates to our Privacy and Data Protection Policy by providing a new version on our website. Therefore, we encourage clients to check our Privacy Policy from time to time to keep themselves informed of the changes. In addition, we may notify clients about the updates of this policy via email or our messaging system.

## **Our Clients' Rights**

We grant clients the right to verify the processing of their data, along with specific additional information, which includes processing details, personal data categories, and recipients of the data. Our clients also have the right to correct any inaccuracies on their data and, considering the purpose of the processing, finish any incomplete data about them.

Clients may also request the removal of their personal data, provided that the data is deemed unnecessary to the purpose for which it was collected or processed. However, there are specific exclusions of the right to destroying data, including where processing is required to practice legal compliance or defense of legal claims and for reasons of public interest.

Our clients have the right to file a complaint with data protection authorities if they believe that the processing of their personal data infringes data protection policies. They may do so in the place of their habitual residence, their place of work, or the place of the suspected infringement.

## **Contact Us**

Please get in touch with us for questions or further details about our Privacy and Data Protection Policy or how we process or use personal data in relation to our website and software applications.