

## **Privacy Policy (TopTraders)**

### **General**

This Privacy Policy (“**Policy**”) is for Users and Visitors, and this and other definitions are as contained in the Disclaimer on this website. This Policy relates to this website [www.TopTraders.io](http://www.TopTraders.io), its sub domains and to us, Simple2Trade.

### **Users**

Primarily, this Policy is directed at Users (registered Users of this website, being host or participants of the contests), during the course of such use, and for such time being after, as applicable. It concerns the privacy of your personal data as a User. If the User is a company, then it may concern the company’s representatives who are using the Services.

### **Visitors**

Visitors may browse this website without registering as Users. You are only asked to register your personal data if you request or require access to and use of the Services.

### **Your Privacy**

We are committed to protecting the privacy of all Visitors and Users of this website. This Policy explains our practices regarding the use and disclosure of personal data collected and processed through our website.

By using this website, and in particular by providing your personal data on registration, or by contacting us for any reason, you accept this Policy and you provide your consent to us to collect, store and process your personal data, in accordance with the terms set out in this policy.

We take this policy very seriously. We ask that you read it carefully. You are deemed to have given your consent to the terms of this Policy in your continued use of this website.

### **Why We Gather Your Information**

For Users, we collect your information to (but not limited to) understanding your needs and to provide you with a better service, and in particular, for the following reasons:

- To identify user groups based on demographics for the prize categories;
- To confirm user email address and activate user “TopTraders” account;
- To send “TopTraders” email communications;
- Internal record keeping;
- To improve offered products and services;
- To send promotional emails about new products, special offers or other information which you may find interesting, using the email address which you have provided;
- From time to time, your information may also be used to contact you for marketing purposes, e.g. by email, phone, fax or mail.
- To send OTP (one time password) to your mobile phone number, when you create a contest as a Host and publish it.

### **Applicable law**

Unless a specific local regulation sets forth to the contrary, the Policy is governed by the laws of Singapore.

## **Security**

We are committed to maintaining the security of personal data and have put in place security procedures and technical and organizational measures, and are committed to continually strengthening these from time to time. This website uses security technology to protect the data submitted by Users, and to prevent interception and leakage of data.

Every effort is made to ensure that User information is secure. In order to prevent unauthorized access or disclosure, suitable physical, electronic and managerial procedures have been put in place to safeguard and secure the information that is collected online. All of the personal information collected from Users on the website, including names, addresses etc., and are stored behind a "firewall".

## **Disclosure and Sharing of Personal Data**

Users allow us, under existing legislation, to share personal data within our group of companies, or with our affiliates for business purposes. Affiliates here are entities that have a direct contractual relation with us, including but not limited to Brokers. We may also require to share your information with third parties for purely administrative, registration, data processing, management, or legal purposes, such as (but not limited to): technology consultants; legal advisors; accountants or auditors; personal data protection intermediaries or such technology providers. We might also inform you of products and services which may be of interest to you.

Other third parties we may share your data with include: for Users, your representative, in fiduciary or attorney capacity on your account; anyone with a legal or beneficial interest on your account; or as may occur under exceptional circumstances, regulatory authorities, law enforcement agencies; or to comply with subpoenas or other official requests; and as necessary to protect our rights or property.

We take strict measures to ensure the security of your personal data when dealing with affiliates and third parties.

You may request a copy of the personal data that we hold on you at any time, with chargeable fees.

You are not required to supply any of the personal data that we may request. However, failure to do so may result in our being unable to open or maintain your account or to provide services to you. While we make every effort to ensure that all data we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal data. If you do not wish to have your personal data disclosed to third parties as described in this Policy, please contact us via e-mail at [contact@Simple2Trade.com](mailto:contact@Simple2Trade.com)

## **Cookies**

We may monitor the use of our Website when Visitors visit us by use of cookies or tracking devices. This data helps to build a profile of you. Some of this data may be aggregated or statistical – meaning that you will not be able to identified individually.

Cookies are used by us to keep track of our Visitors and their activities when using or visiting the website. We may set and access cookies on your computer. This allows us to know the kind of advertisements and promotions which you may bring to our website. The data that is collected and shared through cookies are anonymous and unidentifiable.

While using our site, you agree and authorise us to use cookies in accordance with our Policy. Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept the cookie or not. However, this may impair the quality of the services that we provide to you in relation to your account, as applicable.

## **Regulatory Compliances**

We shall adhere to all regulatory measures required of us under the Persona Data Protection Act 2012 (No. 26 of 2012) Singapore (“**PDPA**”).

## **Links To Other Websites**

Our site may contain links to other websites. This Policy only applies to this Website so that when you link to other websites you should read their own privacy policies.

## **Sale Of Business**

If Simple2Trade’s business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchasers and their advisers, and will be passed on to the new owners of the business.

## **Contact Us**

For any queries on this policy, please feel free to contact us at [contact@Simple2Trade.com](mailto:contact@Simple2Trade.com).

## **Additional Terms**

Certain sections or pages on this site may contain separate terms and conditions, which are in addition to these terms and conditions. In the event of a conflict, the additional terms and conditions shall prevail for those sections or pages.

## **Severability**

Any part of this Policy that is considered illegal or incorrect shall not affect any other part of it, nor any other section or legal notice on this website.

## **User Rights**

Users have the right to access, rectify, erase, block and oppose any processing of their personal data. Moreover, Users may at any time withdraw their consent to the processing of their personal data and information. This withdrawal will not have retroactive effects but may prevent provision of the Services to the withdrawing User. The above is without prejudice to provisions of Singapore applicable law enabling conservation of data for the purpose of defending the responsibility of us and complying with

mandatory legal obligations. The aforementioned rights may be effective by contacting us at [contact@Simple2Trade.com](mailto:contact@Simple2Trade.com)

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