

# Data Protection Policy

## 1. Purpose

This policy establishes an effective, accountable and transparent framework for ensuring compliance with the requirements of the GDPR (General Data Protection Regulation).

## 2. Scope

This policy applies to all CDG Global (EU) Ltd employees and all third parties responsible for the processing of personal data on behalf of CDG Global (EU) Ltd services.

## 3. Policy Statement

CDG Global (EU) Ltd is committed to conducting its business in accordance with all applicable data protection laws and regulations and in line with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of CDG Global (EU) Ltd employees and third parties in relation to the collection, use, retention, transfer, disclosure and destruction of any personal data belonging to CDG Global (EU) Ltd client.

Personal data is any information (including opinions and intentions) that relates to an identified or identifiable natural person. Personal data is subject to certain legal safeguards and other regulations that impose restrictions on how organisations may process personal data. An organisation that handles personal data and makes decisions about its use is known as a Data Controller. CDG Global (EU) Ltd, as a Data Controller, is responsible for ensuring compliance with the data protection requirements outlined in this policy. Non-compliance may expose CDG Global (EU) Ltd to complaints, regulatory action, fines and/or reputational damage.

CDG Global (EU) Ltd's leadership is fully committed to ensuring continued and effective implementation of this policy and expects all CDG Global (EU) Ltd employees and third parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction

### 3.1. Governance

#### 3.1.1 Responsible employee for personal data protection

To demonstrate our commitment to data protection, and to enhance the effectiveness of our compliance efforts, CDG Global (EU) Ltd has assigned data protection responsibilities to the Head of IT. The responsible employee operates with independence and is supported by suitably skilled individual granted all necessary authority and reports to CDG Global (EU) Ltd's CEO. The employee 's duties include:

- Informing and advising CDG Global (EU) Ltd and its employees who carry out processing pursuant to data protection regulations, national law or European Union-based data protection provisions;
- Ensuring the alignment of this policy with data protection regulations, national law or European Union based data protection provisions;
- Providing guidance with regards to carrying out Data Protection Impact Assessments (DPIAs);
- Acting as a point of contact for and cooperating with Data Protection Authorities (DPAs);
- Determining the need for notifications to one or more DPAs because of CDG Global (EU) Ltd 's current or intended personal data processing activities;
- Making and keeping current notifications to one or more DPAs because of CDG Global (EU) Ltd 's current or intended personal data processing activities;

- The establishment and operation of a system providing prompt and appropriate responses to data subject requests;
- Informing senior managers, officers, and directors of CDG Global (EU) Ltd of any potential corporate, civil and criminal penalties that may be levied against CDG Global (EU) Ltd and/or its employees for violation of applicable data protection laws.

Ensuring establishment of procedures and standard contractual provisions for obtaining compliance with this Policy by any third party who:

- provides personal data to CDG Global (EU) Ltd service;
- receives personal data from CDG Global (EU) Ltd service;
- has access to personal data collected or processed by CDG Global (EU) Ltd

#### 3.1.2 Data Protection by Design

To ensure that all data protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, each of them must go through an approval process before continuing. Each CDG Global (EU) Ltd service must ensure that a Data Protection Impact Assessment (DPIA) is conducted, in cooperation with the assigned employee, for all new and/or revised systems or processes for which it has responsibility. The subsequent findings of the DPIA must then be submitted to the CEO for review and approval. Where applicable, the Information Technology (IT) department, as part of its IT system and application design review process, will assess the impact of any new technology uses on the security of personal data.

#### 3.1.3 Compliance Monitoring

To confirm that an adequate level of compliance that is being achieved by all company's department in relation to this policy, the responsible employee will carry out an annual data protection compliance audit for all such services. Each audit will, as a minimum, assess:

- Compliance with policy in relation to the protection of personal data, including:
  - The assignment of responsibilities.
  - Raising awareness.
  - Training of employees.
- The effectiveness of data protection-related operational practices, including:
  - Data subject rights.
  - Personal data transfers.
  - Personal data incident management.
  - Personal data complaints handling.
  - The level of understanding of data protection policies and privacy notices.
  - The currency of data protection policies and privacy notices.
  - The accuracy of personal data being stored.
  - The conformity of data processor activities.
  - The adequacy of procedures for redressing poor compliance and personal data breaches. The responsible employee, in cooperation with key business individuals from each CDG Global (EU) Ltd service, will devise a plan with a schedule for correcting any identified deficiencies within a defined and reasonable time frame. Any major deficiencies and good practice identified will be reported to, monitored and shared by the CDG Global (EU) Ltd executive team.

### 3.2. Data Protection Principles

CDG Global (EU) Ltd has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of personal data:

**Principle 1: Lawfulness, Fairness and Transparency.** Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. This means that CDG Global (EU) Ltd must tell the data subject what processing will occur (transparency), the processing must match the description given to the data subject (fairness), and it must be for one of the purposes specified in the applicable data protection regulation (lawfulness).

**Principle 2: Purpose Limitation.** Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This means CDG Global (EU) Ltd must specify exactly what the personal data collected will be used for and limit the processing of that personal data to only what is necessary to meet the specified purpose.

**Principle 3: Data Minimisation.** Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This means CDG Global (EU) Ltd must not store any personal data beyond what is strictly required.

**Principle 4: Accuracy.** Personal data shall be accurate and, kept up to date. This means CDG Global (EU) Ltd must have processes in place for identifying and addressing out-of-date, incorrect and redundant personal data.

**Principle 5: Storage Limitation.** Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. This means CDG Global (EU) Ltd must, wherever possible, store personal data in a way that limits or prevents identification of the data subject.

**Principle 6: Integrity & Confidentiality.** Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage. CDG Global (EU) Ltd must use appropriate technical and organisational measures to ensure the integrity and confidentiality of personal data is maintained at all times.

**Principle 7: Accountability.** The Data Controller shall be responsible for, and be able to demonstrate compliance. This means CDG Global (EU) Ltd must demonstrate that the six data protection principles (outlined above) are met for all personal data for which it is responsible.

### 3.3 Data Collection

The Company collects the necessary information in a number of ways through the use of our services and website, the account opening applications, our demo sign up forms, webinar sign up forms, website cookies and similar tracking technology built into our Website and Apps, subscribing to news updates and from information provided in the course of our ongoing relationship required to open a client's Demo or Live account. In this respect, the Company gathers information from clients and may, in certain circumstances, gather information from publicly available sources, social media platforms, banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients' profile based on their requirements and preferences in order to provide its services effectively.

Personal data being collected but is not limited to:

- **Identity Data** includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers proof of address, .
- **Professional Data** includes level of education, profession, employer name, work experience in Forex/CFD's, information on Client's experience, knowledge in forex industry and risks.
- **Tax Data** include country of tax residence and tax identification number.
- **Financial Data** includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, E-wallet information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- **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.
- If the client is a professional client, the company is required to collect additional information such as corporate documents of address, shareholders, directors, officers including additional personal information on the Shareholders and Directors;

CDG Global (EU) Ltd may also collect information in regard to use of our Website and may store this information with client 's personal profile. This information may include site area visited, pages viewed, frequency, duration of visit and trading activities.

CDG Global (EU) Ltd need to collect client's personal data as part of statutory obligations or as part of the contractual arrangements CDG Global (EU) Ltd have with the client. If client fails to provide that data when requested, then CDG Global (EU) Ltd will not be allowed to commence or continue our business relationship either as an individual or as the authorised representative/agent or beneficial owner of a legal entity.

#### 3.3.2 Data Subject Consent

CDG Global (EU) Ltd service will obtain personal data only by lawful and fair means and, where appropriate with the knowledge and consent of the individual concerned. Where a need exists to request and receive the consent of an individual prior to the collection, use or disclosure of their personal data, CDG Global (EU) Ltd is committed to seeking such consent. The responsible employee for data protection, in cooperation with other relevant business representatives, shall establish a system for obtaining and

documenting data subject consent for the collection, processing, and/or transfer of their personal data.

### 3.3.3 Data Subject Notification

Each CDG Global (EU) Ltd service will, when required by applicable law, contract, or where it considers that it is reasonably appropriate to do so, provide data subjects with information as to the purpose of the processing of their personal data. When the data subject is asked to give consent to the processing of personal data and when any personal data is collected from the data subject, all appropriate disclosures will be made, in a manner that draws attention to them, unless one of the following apply:

- The data subject already has the information;
- A legal exemption applies to the requirements for disclosure and/or consent. The disclosures may be given orally, electronically or in writing. If given orally, the person making the disclosures should use a suitable script or form approved by the data protection responsible employee. The associated receipt or form should be retained, along with a record of the facts, date, content, and method of disclosure.

### 3.3.4 External Privacy Policy

Each external website provided by CDG Global (EU) Ltd will include an online 'Privacy Policy' and an online 'Cookies Policy' fulfilling the requirements of applicable law.

## 3.4 Data Use

### 3.4.1 Data Processing

CDG Global (EU) Ltd processes client's Personal Data for one or more of the following purposes:

#### Performance of a contract

The processing of client's personal data is necessary in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with the client but also to be able to complete our acceptance procedure so as to enter into a business relationship with potential clients. The purpose of processing personal data depends on whether the client is a natural or legal entity, depends on the classification/ categorisation of the client (i.e. retail, professional) and to the requirements for each service.

#### Compliance with a legal obligation

There are a number of legal obligations imposed by relevant laws to which CDG Global (EU) Ltd is subject, as well as specific statutory requirements. There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These obligations apply at various times, including client on-boarding/acceptance, payments and systemic checks for risk management.

#### For the purposes of safeguarding legitimate interests

The processing of client's personal data is necessary for the purposes of the legitimate interests pursued by CDG Global (EU) Ltd, where those interests do not infringe client's interests, fundamental rights and freedoms. These legitimate interests include business or commercial interests and examples of relevant processing activities include preparing our defence in litigation procedures; preventing fraud and money laundering activities; managing business and further

developing and marketing of products and services; means and processes undertaken to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures.

#### Marketing purposes

The Company may use client data, such as location or trading history to deliver any news, analysis, research, reports, campaigns and training opportunities that may interest the client, to their registered email address. If client do not want to receive information of this nature for any reason, they can contact the Company at the following address: [dataprotection@cdgglobal.eu](mailto:dataprotection@cdgglobal.eu)

#### Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

### 3.4.2 Special Categories of Data

CDG Global (EU) Ltd will only process special categories of data (also known as sensitive data) where the data subject expressly consents to such processing or where one of the following conditions apply:

- The processing relates to personal data that has already been made public by the data subject.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is specifically authorised or required by law.
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
- Further conditions, including limitations, based upon national law related to the processing of genetic data, biometric data or data concerning health.

In any situation where special categories of data are to be processed, prior approval must be obtained from the employee that is responsible for data protection, and the basis for the processing clearly recorded with the personal data in question. Where special categories of data are being processed, CDG Global (EU) Ltd will adopt additional protection measures.

#### 3.4.2 Children's Data

CDG Global (EU) Ltd does not provide any services to children, nor processes any personal data in relation to children, where 'children' are individuals who are under the age of eighteen (18).

#### 3.4.4 Data Quality

Each CDG Global (EU) Ltd service will adopt all necessary measures to ensure that the personal data it collects and processes is complete and accurate in the first instance, and is updated to reflect the current situation of the data subject. The measures adopted by CDG Global (EU) Ltd to ensure data quality include:

- Correcting personal data known to be incorrect, inaccurate, incomplete, ambiguous, misleading or outdated, even if the data subject does not request rectification.

- Keeping personal data only for the period necessary to satisfy the permitted uses or applicable statutory retention period.
- The removal of personal data if in violation of any of the data protection principles or if the personal data is no longer required.
- Restriction, rather than deletion of personal data, insofar as:
  - a law prohibits erasure.
  - erasure would impair legitimate interests of the data subject.
  - the data subject disputes that their personal data is correct, and it cannot be clearly ascertained whether their information is correct or incorrect.

### 3.4.5 Automated decision-making and profiling

In establishing and carrying out a business relationship, CDG Global (EU) Ltd. generally do not use any automated decision-making. CDG Global (EU) Ltd may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you for data assessments (including on payment transactions) which are carried out in the context of combating money laundering and fraud. An account may be detected as being used in a way that is unusual for you or your business. These measures may also serve to protect you.

### 3.4.6 Digital Marketing

As a general rule, CDG Global (EU) Ltd will not send promotional or direct marketing material to client through digital channels such as mobile phones, email and the Internet, without first obtaining their consent. Any CDG Global (EU) Ltd service wishing to carry out a digital marketing campaign without obtaining prior Consent from the data subject must first have it approved by the data protection assigned employee. Where personal data processing is approved for digital marketing purposes, the data subject must be informed at the point of first contact that they have the right to object, at any stage, to having their data processed for such purposes. If the data subject puts forward an objection, digital marketing related processing of their personal data must cease immediately, and their details should be kept on a suppression list with a record of their opt-out decision, rather than being completely deleted. It should be noted that where digital marketing is carried out in a 'business to business' context, there is no legal requirement to obtain an indication of Consent to carry out digital marketing to individuals provided that they are given the opportunity to opt-out.

### 3.5 Data Retention

CDG Global (EU) Ltd will, as required by Law, retain client's Personal Data on record for a period of at least five (5) years on cloud file server and hard copy version. Retention period is calculated after the execution of the transactions or the termination of the business relationship or in case of termination of our business relationship with the client.

When CDG Global (EU) Ltd no longer need personal data, client's Personal Data securely deleted or destroyed.

### 3.6 Data Protection

Each CDG Global (EU) Ltd service will adopt physical, technical, and organisational measures to ensure the security of personal data. This includes the prevention of loss or damage, unauthorised alteration, access or processing, and other risks to which it may be exposed by virtue of human action or the physical or natural environment. A summary of personal data-related security measures is provided below:

- Prevent unauthorised persons from gaining access to data processing systems in which personal data is processed.
- Prevent persons entitled to use a data processing system from accessing personal data beyond their needs and authorisations.
- Ensure that personal data in the course of electronic transmission during transport cannot be read, copied, modified or removed without authorisation.
- Ensure that access logs are in place to establish whether, and by whom, the personal data was entered into, modified on or removed from a data processing system.
- Ensure that in the case where processing is carried out by a Data Processor, the data can be processed only in accordance with the instructions of the Data Controller.
- Ensure that personal data is protected against undesired destruction or loss.
- Ensure that personal data collected for different purposes can and is processed separately.
- Ensure that personal data is not kept longer than necessary.

### 3.7 Data Subject Requests

The employee responsible for personal data protection will establish a system to enable and facilitate the exercise of data subject rights related to:

- Information access.
- Objection to processing.
- Objection to automated decision-making and profiling.
- Restriction of processing.
- Data portability.
- Data rectification.
- Data erasure.

If an individual makes a request relating to any of the rights listed above, CDG Global (EU) Ltd will consider each such request in accordance with all applicable data protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be unnecessary or excessive in nature. Data subjects are entitled to obtain, based upon a request made in writing/email to: [dataprotection@cdgglobal.eu](mailto:dataprotection@cdgglobal.eu).

It should be noted that situations may arise where providing the information requested by a data subject would disclose personal data about another individual. In such cases, information must be redacted or withheld as may be necessary or appropriate to protect that person's rights.

### 3.8 Law Enforcement Requests and Disclosures

In certain circumstances, it is permitted that personal data be shared without the knowledge or consent of a data subject. This is the case where the disclosure of the personal data is necessary for any of the following purposes:

- The prevention or detection of crime.
- The apprehension or prosecution of offenders.
- The assessment or collection of a tax or duty.
- By the order of a court or by any rule of law.

If an CDG Global (EU) Ltd 's function processes personal data for one of these purposes, then it may apply an exception to the processing rules outlined in this policy but only to the extent that not doing so would be likely to prejudice the case in question. If any CDG Global (EU) Ltd service receives a request from a court or any regulatory or law enforcement authority for information relating to an CDG Global (EU) Ltd client, you must immediately notify the data protection responsible employee who will provide comprehensive guidance and assistance.

### 3.9 Data Protection Training

All CDG Global (EU) Ltd employees that have access to personal data will have their responsibilities under this policy outlined to them as part of their staff induction training. In addition, each CDG Global (EU) Ltd department will be provided by regular Data Protection training and procedural guidance.

### 3.10 Disclosure of personal data

In the course of the performance of our contractual and statutory obligations and for legitimate business purposes, your personal data may be disclosed to various departments within the Company but also to other companies of the Group. Various service providers and suppliers may also receive your personal data so that we may perform our obligations.

The Company may be required to provide your personal data to Cyprus Securities and Exchange Commission and other regulatory and government bodies in Cyprus and other countries as may be required by law from time to time.

Based on the above the Company may disclose your personal information to the following:

- Service providers, for business purposes, including third parties such as IT and system administration and professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- Any authority to whom the Company is required to disclose such information be law;
- Payment service providers;
- Our group companies and affiliates; and
- anyone authorised by you.

All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

### 3.11 Complaints Handling

Data subjects with a complaint about the processing of their personal data, should put forward the matter in writing to the responsible employee. An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case. The data protection responsible employee will inform the data subject of the progress and the outcome of the complaint within a reasonable period. If the issue cannot be resolved through consultation between the data subject and the data protection assigned employee then the data subject may, at their option, seek redress through mediation,

binding arbitration, litigation, or via complaint to the Data Protection Authority within the applicable jurisdiction.

### 3.12 Breach Reporting

Any individual who suspects that a personal data breach has occurred as a result of the theft or exposure of personal data must immediately notify the data protection responsible employee providing a description of what occurred. Notification of the incident can be made via email at [dataprotection@cdgglobal.eu](mailto:dataprotection@cdgglobal.eu), or by calling at +35725734400. The employee in charge will investigate all reported incidents to confirm whether or not a personal data breach has occurred. If a personal data breach is confirmed, the assigned employee for data protection will follow the relevant authorised procedure based on the criticality and quantity of the personal data involved. For severe personal data breaches, the CDG Global (EU) Ltd Executive Team will initiate and chair an emergency response team to coordinate and manage the personal data breach response.

## 4. Roles and Responsibilities

### 4.1 Implementation

CDG Global (EU) Ltd must ensure that all employees who are responsible for the processing of personal data, are aware of and comply with the contents of this policy. In addition, each CDG Global (EU) Ltd service will make sure all third parties engaged to process personal data on their behalf (i.e. their data processors) are aware of and comply with the contents of this policy. Assurance of such compliance must be obtained from all third parties, whether companies or individuals, prior to granting them access to personal data controlled by CDG Global (EU) Ltd.

### 4.2 Support, Advice and Communication

For any advice and support in relation to this policy, please contact data protection assigned employee, Mr. Kyriakos Theodoulidis on +35725734400 or email at [dataprotection@cdgglobal.eu](mailto:dataprotection@cdgglobal.eu).

### 4.3 Policy Review

This policy will be reviewed by the responsible employee for data protection annually, unless there are any changes to regulations or legislation that would enable a review earlier.

### 4.4 Records Management

Staff must maintain all records relevant to administering this policy and procedure in electronic form in a recognised CDG Global (EU) Ltd recordkeeping system.

All records relevant to administering this policy and procedure will be maintained for a period of five years.

## 5. Terms and Definitions

**General Data Protection Regulation (GDPR):** the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). It also addresses the export of personal data outside the EU.

**Data Controller:** the entity that determines the purposes, conditions and means of the processing of personal data.

**Data Processor:** the entity that processes data on behalf of the Data Controller.

**Data Protection Authority:** national authorities tasked with the protection of data and privacy as well as monitoring and enforcement of the data protection regulations within the Union.

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**Data subject:** a natural person whose personal data is processed by a controller or processor.

**Personal data:** any information related to a natural person or 'data subject', that can be used to directly or indirectly identify the person.

**Privacy Impact Assessment:** a tool used to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data.

**Data Processing:** any operation performed on personal data, whether or not by automated means, including collection, use, recording, etc.

**Profiling:** any automated processing of personal data intended to evaluate, analyse, or predict data subject behaviour.

**Regulation:** a binding legislative act that must be applied in its entirety across the Union.

**Subject Access Right:** also known as the Right to Access, it entitles the data subject to have access to and information about the personal data that a controller has concerning them.