



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

GLOBAL TRADERS FUNDING LTD Privacy Policy

Last updated March 14, 2023

Thank you for visiting <https://globaltraders.pro> ("Site"). The Site is owned and operated by GLOBAL TRADERS FUNDING LTD. (together "GLOBAL TRADERS", "we", "our", or "us" means Global Traders.).

This Privacy policy ("Privacy Policy") together with our Terms of Service (which can be found at <https://globaltraders.pro>) ("Terms of Service") sets out the basis on which any Personal Information we collect from you ("you", "your", or "customer"), or that you provide to us, will be processed by us. By "Personal Information", we mean any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, for example your name, email address, username, contact details or any unique identifier such as an IP address, device ID or other online identifier.

Please read the following carefully to understand what data we collect, how that data is used and the ways it can be shared by us. If you do not wish for your Personal Information to be used in the ways described within this Privacy Policy then you should not access or use the Site or use the services, functions, or features offered from time to time on the Site ("Services").

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

If you are accessing the Site from the US, the data controllers of your Personal Information are:

Global Traders, a company which is registered in the 128 City Road,
London, United Kingdom, EC1V 2NX

1 What information do we collect?

1.1. Information you give us. This is information about you that you give us by:

registering for a GLOBAL TRADERS account;

using the Support Centre on the Site; or

corresponding with us by phone, e-mail or otherwise; or

purchasing LEO tokens or LEO tokens being repurchased on the Site; or

purchasing Digital Tokens on the Token Sales Site; or

using the Global Traders Pulse Service, including the information you provide when you create or update your user profile or the information you create, post or submit through the GLOBAL TRADERS Pulse Service (such user profile, a "Global Traders Pulse Bio" and such information created, posted or submitted through the Global Traders Pulse Service, a "pulse").

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GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

The Personal Information most often collected and maintained in a customer file includes customer identification, transaction history including records of payments made.

1.2. Information we collect about you. Each time you use the Services, we may automatically collect the following information, which may be considered to be Personal Information when combined with other information about you:

technical information, including the Internet protocol (IP) address used to connect your computer or other device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

information about your visit, including the dates and times you use the Site length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call the contact phone number provided on our Site; and

information about your usage patterns and behavior on the GLOBAL TRADERS Pulse Services, including the pulses you have searched for, viewed, commented on or shared.

Similar to other websites, our Sites utilize browser cookies (small text files stored on a user's web browser when you visit a website), web beacons and similar tracking technologies (collectively, "Cookies") to collect and store certain information when you use, access, or interact

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

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all its amendments and the Directives issued by CySEC (the "Regulations") are the regulatory

framework that governs Trading in Financial Instruments.

This policy outlines the Company's responsibility to manage the protection of privacy and the

safekeeping of clients' personal and financial information. Your privacy is Company's highest priority

and applies to all users of the Company's website ("website"), whether you are a former, present or

potential client of the Company.

The Company follows difference principles in accordance to global protection acts in order to achieve

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

client privacy and data protection. By subscribing to and/or using (collectively, "Using" or "Use") the

Service, the Client express his consent to the terms of this Policy. If the Client does not agree to the

terms and provisions of this Policy the Client shall not Use the Service. The Client hereby gives its

consent to such collection, processing, storage and use of personal information by the Company as

explained below.

In addition, as a recipient of our Service, the Client commits to provide appropriate notice of its privacy

practices to, and obtain the necessary permissions and consent from any User whose Personal

Information is collected, received, used, and/or disclosed (collectively, "Process(ed)") by the

Company.

Special categories of data.

We do not collect any special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions,

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Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

trade union membership, information about your health and genetic and biometric data). However, you may be required to send us information relevant to establishing your identity such as photographs and copies of your government issued photographic identification documents.

Information we may collect from third party sources

We may receive information about you from other sources, including: (i) third parties that help us update, expand, and analyze our records; prevent or detect fraud; process payments; or analyze your use of our Services, (ii) third parties with whom you choose to link with the Services through functionality we make available to you, such as your decision to link your Twitter account with the Global Traders Pulse Services, in which case, we may obtain information such as the number of followers for display on your Global Traders Pulse Bio and in connection with the pulses you create, post or submit through the Global Traders Pulse Services, and (iii) third parties you are engaging with or with whom you have engaged to provide custody, settlement or execution services in connection with your access of the Services. Our Services may also include integrated content or links to content provided by third parties (such as live chat, social media content, plug-ins and applications). Additional third parties may include our affiliated entities.

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

2 Purposes for which we collect your Personal Information.

If you wish to transact on and use the Site or use the Services, Global Traders will collect information about you for the purposes set out below.

Information you provide to us may be used to:

- 2.1. establish and maintain a responsible commercial relationship with you;
- 2.2. understand your needs and your eligibility for products and services;
- 2.3. inform you about trading and financing features;
- 2.4. provide information to you about developments and new products, including changes and enhancements to the Site;
- 2.5. develop, enhance, and market products and services, and provide products and services to you;
- 2.6. process billing and collection of any fees;
- 2.7. conduct surveys and get feedback from you;
- 2.8. deliver products and services to you;
- 2.9. provide you with news and other matters of general interest to you as a Global Traders customer;
- 2.10. as we believe reasonably necessary, advisable or appropriate to comply with our legal or regulatory obligations and to respond to

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Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

legal, regulatory, arbitration or government process or requests for information issued by government authorities or other third parties or to protect your, our, or others' rights; and

2.11. when you purchase LEO tokens we may also use the information we collect to process your payment for those tokens, to respond to your enquiries or to any problems that may arise (such as difficulties in purchasing LEO tokens).

2.12. when you use the Global Traders Pulse Service, we may also use the information we collect or that you provide to link with third party social media platforms (such as Twitter), to ensure that pulses meets our standards and guidelines, and to develop incentive and reward mechanisms to improve the quality of pulses.

2.13. Global Traders and members of the GLOBAL TRADERS FUNDING LTD (including our affiliates and subsidiaries) may send marketing communications where you have agreed to us doing so. You can opt out of receiving marketing emails from us by following the instructions contained in any such message or by contacting us at any time (see Section "Contact" below). Please note that even if you unsubscribe to marketing communications, we still may need to send you communications relating to your use of the Site, such as service announcements and if we may need to send certain information to you under a legal requirement.

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Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

Global Traders uses IP addresses to analyze trends, administer the Site, track customer movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes, Global Traders web servers also automatically log standard access information including browser type, access times/open mail, URL requested, and referral URL. This information is not shared with third parties and is used only within Global Traders on a need-to-know basis. Global Traders reserves the right to block access for any customer accessing the Site via a proxy service intending to conceal originating identity. This includes access via the Tor anonymity network.

We may also aggregate personal and other data captured by us so that the data is no longer capable of identifying an individual. Aggregated data may cover patterns of usage or information and data that you provide to us, and we reserve the right to use this aggregated information for the purposes of improving and enhancing our Services, generating insights, for use in marketing to other users and current and potential partners and otherwise for the purposes of our business. Provided that such aggregated data does not directly or indirectly identify you as an individual, this data is not considered to be personal information for the purpose of this Privacy Policy.

3 Legal bases on which we process your Personal Information

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

3.1. We will process your Personal Information on the following grounds:

where it is necessary for us to perform pursuant to our contract with you or in your interests; and/or

where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interests mean the interests of our organization to conduct and manage our business to enable us to better serve you and provide you with a secure experience on the Site; and/or

as may be required to comply with any legal or regulatory obligations that may apply to us, for instance under anti-money laundering and sanctions regimes.

(We ensure that we balance any potential impact on you and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.)

3.2. Generally, we do not rely on consent as a legal basis for processing your Personal Information other than in relation to our use of cookies (please see our cookies policy for more details which can be found at

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

<https://globaltraders.pro>) or when we send third party direct marketing communications to you via email or text message.

4 Security and confidentiality.

4.1. Global Traders is committed to protecting your privacy. Internally, only people with a business need to know Personal Information, or whose duties reasonably require access to it, are granted access to customers' Personal Information. Such individuals will only process your Personal Information on our instructions and are subject to a duty of confidentiality. Externally, GLOBAL TRADERS has taken reasonable steps to ensure that any third party with whom we share your Personal Information will provide the same or comparable protection as stated in this Privacy Policy.

4.2. The Site's systems and data are reviewed periodically to ensure that you are getting a quality service and that leading security features are in place. We have put in place procedures to deal with any actual or suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

4.3. However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the internet and wireless networks.

4.4 Global Traders has data retention and deletion policies designed to retain Personal Information for no longer than necessary for the

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

purposes set out herein or as otherwise required to meet legal or business needs.

5 Disclosures.

5.1. You agree that we have the right to share your Personal Information with:

Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries including their respective contractors, affiliates, employees or representatives.

Third parties you are engaging with or with whom you have engaged to provide custody, settlement or execution services in connection with your access of the Services

Our service providers, to the extent necessary to supply

Selected third parties, including analytics and search engine providers that assist us in the improvement and optimization of the Services.

.Authorities and law enforcement agencies worldwide either when ordered to do so or on a voluntary basis if this appears reasonable and necessary to us (please refer to our Law Enforcement Requests Policy).

5.2. We will also disclose your Personal Information to third parties:

If Company Global Traders or substantially all of its assets are acquired by a third party, in which case Personal Information held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or in order to enforce or

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

apply our Terms of Service and other agreements; or to protect the rights, property, or safety of us, our clients, or others. Global Traders reserves the right to share current and historical bids, asks, and market prices; opening and closing range prices; high–low prices; trade prices; estimated and actual trade volumes; settlement prices; and other aggregate data and information related to the digital tokens or Derivatives Products traded on the Site, including LEO tokens.

If you are using the Global Traders Pulse Service, your Global Traders Bio, along with any pulses that you submit or post as ‘public’, will be accessible and searchable by anyone on the internet. Information posted about you by other users of the Global Traders Pulse Service may also be public (e.g., if they tag you in a ‘public’ pulse). In addition, users of the Global Traders Pulse Service that are following you will receive notification of these pulses. Accordingly, we strongly encourage you to keep any pulses that you create and consider sensitive or confidential to be ‘private’ and that you carefully consider the content of your pulses before making them ‘public’. While the Global Traders Service may permit you to delete your pulses after they have been made ‘public’, we cannot guarantee that they have not been saved or cached by users of the Global Traders Service or others that have viewed your pulse on the internet.

6 Transfers.

6.1. Your Personal Information will be stored in the European Economic Area and may be transferred worldwide.

6.2. Personal Information and other data may therefore be exported outside of the jurisdiction in which you reside. Your Personal

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter “CySEC”).

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

Information may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside.

6.3. Unfortunately, the transmission of information via the Internet is not completely secure. While we do our utmost to protect your Personal Information, we cannot guarantee the security of your data transmitted to us over the email or through the Site; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access.

EEA customers only

6.4. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. All data you provide to us is stored on our secure servers. Where we transfer our data outside of the EEA, we ensure that adequate safeguards are in place. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Information out of the EEA.

Your rights.

7 All Customers

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

7.1. You may access, verify, request the deletion of your Personal Information held by Global Traders and, where consent is the legal basis for processing of your Personal Information and subject to any legal or contractual restrictions, withdraw your consent, in each case, by submitting a written.

7.2. If you no longer wish to receive marketing communications from us, you can also let us know via through the methods stated below. The electronic marketing communications we send to you also contain opt-out mechanisms that allow you to opt-out from receiving those communications, update your contact information or change your preferences at any time. We will honor your choice and refrain from sending you such announcements. You may also opt back in to receive those communications at any time.

EEA Customers

7.3. You have a number of rights in relation to how we process your Personal Information. These include the right to:

access the Personal Information that we may hold about you;

rectify any inaccurate Personal Information that we may hold about you;

have your Personal Information erased in certain circumstances, for example, where it is no longer necessary for us to process your Personal Information to fulfill our processing purposes; or where you have exercised your right to object to the processing;

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

restrict the processing of your Personal Information where, for example, the information is inaccurate or it is no longer necessary for us to process such information or where you have exercised your right to object to our processing;

object to the processing of your Personal Information which may be exercised in certain circumstances, for example, where we are processing your Personal Information for direct marketing purposes, or where your own legitimate interests outweigh ours; and

have your data ported to a new service provider if you no longer wish to use the Services.

You may exercise these rights by contacting us (see details below).

No fee usually required.

You will not have to pay a fee to access your Personal Information or to exercise any of your other rights. We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8 Other Sites and protecting your Personal Information.

8.1. This Privacy Policy and the use of your Personal Information only applies to the information you provide to us. You are cautioned that if you disclose Personal Information or personally sensitive data through use of the Internet, such as through chat rooms, communities, bulletin boards, or other public online forums, this information may be collected and used by other persons or companies over which Global Traders has no control. Our Site and other services may include integrated content or links to content provided by third parties (such as video materials, social media content, plug-ins and applications). Please note that the websites, applications and services of third parties

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

(including affiliate entities, associated companies, sponsors, advertisers or other persons) will be governed by the privacy settings, policies, and/or procedures of the third party, which may differ from this Privacy Policy. This Privacy Policy does not address, and we are not responsible for or able to control, the privacy, security, or other practices of any third parties. It is your responsibility to review the privacy statements, policies, terms, and conditions of any person or company to whom you choose to link or with whom you choose to contract. Global Traders is not responsible for the privacy statements, policies, terms, conditions, or other content of any Site not owned or managed by Global Traders.

8.2. Global Traders takes all reasonable endeavor's to protect and safeguard Personal Information, but there are protective measures you should take, as well. Do not share your Personal Information with others unless you clearly understand the purpose of their request for it and you know with whom you are dealing. Do not keep sensitive Personal Information in your e-mail inbox or on Webmail. If you are asked to assign passwords to connect you to your Personal Information, you should use a secure password and always use two-factor authentication (2FA), where available. You should change your password regularly.

9

9.1. Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

10

An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

10.1. Questions, comments and requests regarding this Privacy Policy should be addressed to support@globaltraders.broker.

11

11.1. Should you have any concerns about how we handle your Personal Information, please contact us in the first instance. We will do our best to resolve your concern. Alternatively, you may prefer to submit a complaint directly to the national supervisory authority within your jurisdiction, details of which can be found online.

12 Data subjects under eighteen

12.1. Our business is not directed at anybody under the age of eighteen, and we will never knowingly collect personal information from individuals under the age of eighteen.

12.2. Persons under the age of eighteen are not permitted to purchase LEO tokens

13 Restriction of responsibility

The Company's website <https://globaltraders.pro> may be linked to other sites, the Company will not be

held responsible or liable for the privacy policies or content of such sites, and therefore has no control

other the protection and use of information provided by the clients on such sites.

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

13.1 Use of "COOKIES"

The company may use cookies to assess and improve the performance of the website and its products

and services offered to its client. Cookies are used by most internet browsers and are small pieces of

information which use a unique identification tag and are stored on your device as a result of you

using this website or other services we provide to you.

Clients may be able to refuse to have cookies stored on their device by viewing options to change the

setting of your browser to refuse all cookies, and/or notify you each time a cookie is sent from their

device. By controlling your cookies in this way may impair the quality of service provided by the

Company.

13.2 Updates

The Company has the right to amend the current Policy at its discretion and at any time it considers is

suitable and appropriate; the Company shall review and amend the current policy at least on an annual

basis. The Policy is available for review by clients upon request and it is uploaded on the Company's

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with license number 348/23. Company Number 14730206

Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including



GLOBAL
TRADERS
FUNDING LTD

Europe`s Trading Broker

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An investment company that is regulated by the UK Securities and Exchange Commission (hereinafter "CySEC").

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Law on Investment Services, Activities and Regulated Markets of 2023 (L. 87 (I) / 2023), including