



# PRIVACY POLICY



[support@alpextrading.com](mailto:support@alpextrading.com)



[www.alpextrading.com](http://www.alpextrading.com)



## PRIVACY POLICY

Alpex Ventures Ltd, a legal entity incorporated and registered in Saint Vincent and the Grenadines under registration number 27117 and with its registered address at Suite 305, Griffith Corporate Center, Beachmont, Kingstown, Saint Vincent and the Grenadines (hereinafter referred to as “the Company,” “we,” “us,” or “our”), respects your privacy and is committed to protecting your personal data. This Privacy Policy is designed to inform you about how we safeguard your personal data when you visit our website (regardless of your location) and to explain your privacy rights and how applicable data protection laws, including the General Data Protection Regulation and other relevant regulations, protect you.

### Chapter A: Scope of Agreement

#### 1. Important Information

##### Purpose

This Privacy Policy is intended to inform you about how Alpex Ventures Ltd collects and processes your personal data when you use our website, including any data you provide when signing up.

Our website is not designed for children, and we do not knowingly collect data from children.

It is essential to read this Privacy Policy together with any other privacy or fair processing notices we may provide on specific occasions when we collect or process personal data about you. These additional notices will help ensure you are fully informed of how and why we use your data. This Privacy Policy serves to supplement those notices and does not replace them.

##### Controller

Alpex Ventures Ltd is the controller responsible for your personal data.

We have appointed a Data Protection Officer (hereinafter referred to as “the DPO”), who oversees questions regarding this Privacy Policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the DPO using the details provided below.

#### CONTACT DETAILS

Our full contact details are as follows:

Full Name of Legal Entity: Alpex Ventures Ltd

Email Address: support@alpextrading.com

Postal Address: Suite 305, Griffith Corporate Center, Beachmont, Kingstown, Saint Vincent and the Grenadines

##### Legal Framework

This Privacy Policy is established in accordance with the General Data Protection Regulation (GDPR), which came into effect on January 21, 2020, and outlines your rights under this Regulation.

It is important that the personal data we hold about you is accurate and up-to-date. Please inform us of any changes to your personal data during your business relationship with us.

##### Third-Party Links



Our website may include links to third-party websites, plug-ins, and applications. Clicking on these links or enabling such connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to review the privacy policy of every website you visit.

## 2. The Data We Collect About You

Personal data, or personal information, refers to any information about an individual that can identify that person. This does not include data where identity details have been removed (anonymous data).

We may collect, use, store, and transfer various types of personal data about you, grouped as follows:

- **Identity Data:** Includes first name, middle name, last name, username or similar identifiers, marital status, title, date of birth, and gender.
- **Contact Data:** Includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Includes bank account details and payment card information.
- **Transaction Data:** Includes details about payments to and from you, as well as your transaction history.
- **Technical Data:** Includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, platform, and other technology on the devices you use to access our 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, as well as your communication preferences.

We may also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data under relevant law as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a particular website feature. However, if we combine or connect Aggregated Data with your personal data in a way that could identify you, we treat the combined data as personal data, which will be handled according to this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, health information, genetic and biometric data). Additionally, we do not collect information regarding criminal convictions and offenses.

### If You Fail to Provide Personal Data

In the course of our business, if we need to collect personal data by law or under the terms of a contract with you and you fail to provide that data when requested, we may not be able to deliver our services to you or fulfill the contract. In such cases, we may be forced to discontinue our services to you, but we will notify you if this becomes necessary.

## 3. How is Your Personal Data Collected?



We use various methods to gather data from and about you, including:

- **Direct Interactions:** You may provide us with your personal data by filling in forms or by contacting us via mail, phone, email, or other means. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our services or publications;
  - request marketing materials;
  - enter a competition, promotion, or survey; or
  - provide feedback.
- **Automated Technologies or Interactions:** As you interact with our website, we may automatically collect Technical Data about your device, browsing actions, and patterns. This personal data is collected through cookies, server logs, and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies.
- **Third Parties or Publicly Available Sources:** We may obtain personal data about you from various third parties and public sources, such as Technical Data from analytics providers like Google, which may be based outside the EU.

#### 4. How We Use Your Personal Data

We will only use your personal data when permitted by law. The most common instances in which we use your personal data are:

- When we need to provide our services to you or perform the contract that we are about to enter or have entered into with you.
- When it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- When we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, except when sending direct marketing communications from third parties via email or text message. You have the right to withdraw consent for marketing at any time by contacting us at [support@alpextrading.com](mailto:support@alpextrading.com).

#### Marketing

We aim to provide you with choices regarding the use of your personal data, particularly for marketing and advertising.

#### Promotional Offers from Us

We may utilize your Identity, Contact, Technical, Usage, and Profile Data to gain insights into what products, services, or offers may be relevant to you based on your preferences and interests. This is how we tailor our marketing to align with your needs and interests.

You will receive marketing communications from us if you have requested information or purchased services from us, or if you provided your details on our website to receive information. In each case, you will continue to receive these communications unless you have opted out.



### Third-Party Marketing

We will obtain your explicit consent before sharing your personal data with any external company outside the Alpex Ventures Ltd group for marketing purposes.

### Opting Out

You may request that we or third parties stop sending you marketing messages at any time. You can do this by logging into your account on our website and adjusting your marketing preferences, using the opt-out links provided in any marketing message sent to you, or by contacting us directly at [support@alpextrading.com](mailto:support@alpextrading.com).

### Cookies

Alpex Trading may use cookies to enhance your experience when visiting our website, to improve the site's services, and to optimize its functionality and security. "Cookies" are small data files that are transferred to your browser and stored on your device. When you view the website, it prompts the browser to create a small text file containing a limited amount of information.

#### Types of Cookies Used:

- **Session Cookies:** These are essential for website functionality. They are set automatically when pages load and are stored temporarily in your browser, existing only while you browse the site. When you close the browser, session cookies are removed. They do not store any data on your device's hard drive or collect information from your computer.
- **Persistent Cookies:** Used to enhance functionality by storing your preferences, such as location, username, and text size. These cookies remain on your device's hard drive until they are deleted or expire. Persistent cookies allow us to provide more personalized features, like remembering your preferences on your account page or displaying specific messages only to first-time visitors. The information collected may be anonymized and does not track browsing activity on other sites.
- **Performance Cookies:** These cookies help us understand how visitors use the website, such as which pages are most frequently visited or if there are error messages. They do not collect information that identifies individual visitors; all data is aggregated and anonymous. This data helps us improve the website's performance and provides us with valuable statistics, including page visits, time spent, technology used, and page load speeds.

### Managing Cookies

You can refuse cookies by adjusting your browser settings. Each browser has different settings, so if you use more than one, you will need to disable cookies on each one individually. For guidance on deleting or controlling cookies on your device, please visit: <https://www.aboutcookies.org>

Please note that disabling cookies may impact certain website functionalities, as some features rely on cookie data to remember your preferences.

### Change of Purpose

We will only use your personal data for the purposes for which it was originally collected, unless we determine that it is necessary to use it for another reason compatible with the original purpose. If you would like an explanation of how a new purpose aligns with the original one, please contact us at [support@alpextrading.com](mailto:support@alpextrading.com).



If we need to use your personal data for an unrelated purpose, we will inform you and provide the legal basis for doing so.

Please note that, in accordance with the applicable laws, we may process your personal data without your knowledge or consent if legally required or permitted.

## 5. Disclosures of Your Personal Data

We may need to share your personal data with third parties to fulfill our services. When this is necessary, we take measures to ensure secure and lawful handling. We require all third parties to uphold the security of your personal data and handle it in compliance with applicable laws. We do not allow third-party service providers to use your personal data for their own purposes and only authorize them to process your data for specific purposes and according to our instructions.

## 6. Data Security

We have implemented appropriate security measures to protect your personal data from accidental loss, unauthorized access, alteration, or disclosure. Additionally, we limit access to your personal data strictly to employees, agents, contractors, and third parties who have a legitimate business need. These parties will process your data only as directed by us and are bound by confidentiality obligations.

We have procedures in place to address any suspected data breach and will inform you and any relevant regulatory body if we are legally required to do so.

## 7. Data Retention

### How Long Will Your Personal Data Be Retained?

We retain your personal data only as long as necessary to fulfill the purposes for which it was collected, including meeting any legal, accounting, or reporting obligations.

To establish the appropriate retention period, we assess the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether these purposes can be achieved through alternative means, and any applicable legal requirements.

In some cases, you may request data deletion; please see the "Request Erasure" section for more details.

In certain instances, we may anonymize your personal data (removing any association with your identity) for research or statistical purposes, enabling us to use this information indefinitely without further notice to you.

## 8. Your Legal Rights

Under certain circumstances, data protection laws grant you rights concerning your personal data. These include:

- Request Access: Obtain a copy of the personal data we hold about you and verify its lawful processing.
- Request Correction: Correct incomplete or inaccurate personal data we hold, though we may need to verify the new data's accuracy.
- Request Erasure: Request deletion of your personal data where there's no good reason for its continued processing. You may also request erasure if you've objected to processing, if we've processed your information unlawfully, or if required by law. Note that we may not always be able to comply due to specific legal reasons, which will be communicated at the time of your request.



- **Object to Processing:** Object to processing your personal data if it affects your fundamental rights and freedoms, especially if we're relying on a legitimate interest. You may also object if your data is processed for direct marketing. In some cases, we may demonstrate compelling grounds that override your rights and freedoms.
- **Request Restriction of Processing:** Ask us to suspend processing your personal data in specific cases, such as verifying its accuracy, unlawful data use where erasure isn't desired, retaining data for legal claims, or when you've objected to processing but need verification on legitimate grounds.
- **Request Data Transfer:** Request your personal data in a structured, commonly used, machine-readable format, either to you or a third party. This right applies to automated data initially provided with consent or used to perform a contract with you.
- **Withdraw Consent:** Withdraw your consent at any time where consent was the basis for processing your personal data. This does not affect the lawfulness of any processing conducted prior to withdrawal. Note that withdrawing consent may impact our ability to provide certain products or services, which we will notify you of if applicable.

### **No Fee Usually Required**

Accessing your personal data or exercising your other rights typically incurs no fee. However, if a request is clearly unfounded, repetitive, or excessive, we may charge a reasonable fee. In certain cases, we may also refuse to comply with such requests.

### **What We May Need from You**

To confirm your identity and ensure your right to access your personal data or exercise other rights, we may request specific information. This security measure helps prevent unauthorized access to your data. We may also reach out for additional information to expedite our response.

### **Time Limit to Respond**

We aim to respond to all legitimate requests within one month. If a request is complex or you have made multiple requests, it may take longer, but we will keep you informed of any delays.

### **Amendments to the Policy**

The Company reserves the right to review and amend this privacy policy periodically. Updates will be posted on the Company's website, and you will be notified of any changes accordingly.