

## **2.3 PRIVACY POLICY**

**In accordance to UK GDPR Rules as of May 2018**

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

**MAY 2018**

At Knightsbridge Trading Academy, we care about the privacy of your data and are committed to protecting it. This Privacy Policy explains what information we collect about you and why, what we do with that information, and how we handle that information. Throughout this policy, when we write “Knightsbridge” “Knightsbridge Trading Academy” or “KTA” “we” or “us,” we’re referring to Knightsbridge Trading Academy Limited., incorporated in England & Wales, and our subsidiaries and other affiliates.

### **What is the scope of this Privacy Policy?**

This Privacy Policy (“Policy”) is incorporated into Knightsbridge Trading Academy Terms of Service and License Agreement located at <http://ktafx.com/general-terms-and-conditions/> (the “Terms of Service”) and applies to the information obtained by us through your use of KTA Site, Software, and Services (“Information”) as described in this Policy. Capitalised terms used in this Policy and not otherwise defined shall have the meanings provided for those terms in the Terms of Service.

## **Information collection and use**

What Information does Knightsbridge Trading Academy collect about me?

When you interact with our Site, Software, and/or Services, we collect Information that, alone or in combination with other data, could be used to identify you (“Personal Data”). Some of the Information we collect is stored in a manner that cannot be linked back to you (“Non-Personal Data”).

### **Information you provide us when you create an account**

When you sign up for or use our Services, you voluntarily give us certain Personal Data, including:

- Your username, email address, and contact and language preferences. If you log into KTA with a social networking credential, such as with your Facebook or Google+ account, we will ask permission to access basic information from that account, such as your name and email address. You can stop sharing that information with us at any time by removing KTA access to that account.
- Your payment information, if you are a paying customer. This is required to complete a commercial transaction on the Site. We use this information to enable and fulfill your transaction. If you choose to use Worldpay to finalize and pay for your order, you will provide your credit card number directly to Worldpay. The privacy policy of Worldpay will apply to the information you provide on the Worldpay website.

### **Other Information we collect**

We collect this Information as you use the Site, Software, and/or Services:

- UserContent. This consists of all text, documents, or other content or information uploaded, entered, or otherwise transmitted by you in connection with your use of the Services and/or Software.

### **Automatically collected Information**

Certain data about the devices you use to connect with KTA and your use of the Site, Software, and/or Services are automatically logged in our systems, including:

- Location information. This is the geographic area where you use your computer and mobile devices (as indicated by an Internet Protocol [IP] address or similar identifier) when interacting with our Site, Software, and/or Services.
- Log data. As with most websites and technology services delivered over the internet, our servers automatically collect data when you access or use our Site, Software, and/or Services and record it in log files. This log data may include the IP address, browser type and settings, the date and time of use, information about browser configuration, language preferences, and cookie data.
- Usage information. This is information about the KTA Site, Software, and/or Services you use and how you use them. We may also obtain data from our third-party partners and service providers to analyze how users use our Site, Software, and/or Services. For example, we will know how many users access a specific page on the Site and which links they clicked on. We use this aggregated information to better understand and optimize the Site.
- Device information. These are data from your computer or mobile device, such as the type of hardware and software you are using (for example, your operating system and browser type), as well as unique device identifiers for devices that are using KTA Software.
- Cookies. Data obtained from cookies are described in the "Does KTA use cookies?" section and in our cookie policy.

### **How does KTA use my Information?**

- to help us administer our Site, Software, and/or Services, authenticate users for security purposes, provide personalized user features and access, process transactions, conduct research, develop new features, and improve the features, algorithms, and usability of our Site, Software, and/or Services.
- to communicate with you about your use of our Site, Software, and/or Services, product announcements, and software updates, as well as respond to your requests for assistance, including providing account verification support if you're having difficulty accessing your account.
- to send you direct marketing emails and special offers about KTA, from which you can unsubscribe at any time. If you are located in the European Economic Area (EEA), we will only send you marketing information if you consent to us doing so at the time you create your account or any point thereafter.

- to display User Content associated with your account and make sure it is available to you when you use our Services
- to calculate aggregate statistics on the number of unique devices using our Site, Software, and/or Services, and to detect and prevent fraud and misuse of those.

### **Does KTA review User Content?**

As a rule, KTA employees do not monitor or view your User Content stored in or transferred through our Site, Software, and/or Services, but it may be viewed if we believe the Terms of Service have been violated and confirmation is required, if we need to do so to respond to your requests for user support, if we otherwise determine that we have an obligation to review it as

described in the Terms of Service, or to improve our algorithms as described in the User Content section of our Terms of Service. In addition, if you request our human proofreading services, our proofreaders may also read the User Content you submit for this specific service, as necessary to perform our contract with you and for our legitimate business interests. Finally, your Information may be viewed where necessary to protect the rights, property, or personal safety of KTA and its users, or to comply with our legal obligations, such as responding to warrants, court orders, or other legal processes.

## **Information access and disclosure**

### **Does KTA share my Information?**

We only disclose Personal Data to third parties when:

- We use service providers who assist us in meeting business operations needs, including hosting, delivering, and improving our Services. We also use service providers for specific services and functions, including email communication, customer support services, and analytics. These service providers may only access, process, or store Personal Data pursuant to our instructions and to perform their duties to us.
- We have your explicit consent to share your Personal Data.
- We believe it is necessary to investigate potential violations of the Terms of Service, to enforce those Terms of Service, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or potential threats against persons, property, or the systems on which we operate our Site, Software, and/or Services.
- We determine that the access, preservation, or disclosure of your Personal Data is required by law to protect the rights, property, or personal safety of KTA and users of our Site, Software, and/or Services, or to respond to lawful requests by public authorities, including national security or law enforcement requests.
- We need to do so in connection with a merger, acquisition, bankruptcy, reorganization, sale of some or all of our assets or stock, public offering of securities,

or steps in consideration of such activities (e.g., due diligence). In these cases some or all of your Personal Data may be shared with or transferred to another entity, subject to this Privacy Policy.

We may disclose Non-Personal Data publicly and to third parties – for example, in public reports about financial trading, to partners under agreement with us, or as part of progress reports we may provide to users.

Through the use of cookies, we help deliver advertisements for relevant KTA products and services to you.

KTA does not share your Personal Data with third parties for the purpose of enabling them to deliver their advertisements to you.

### **Does KTA sell or rent my Personal Data?**

No, KTA does not sell or rent your Personal Data.

### **Does KTA use cookies?**

Cookies are small text files stored on your device and used by web browsers to deliver personalized content and remember logins and account settings. KTA uses cookies and similar technologies, including tracking pixels and web beacons, to collect usage and analytic data that helps us provide our Site, Software, and/or Services to you, as well as to help deliver ads for relevant KTA products and services to you when you visit certain pages on the Site and then visit certain third-party sites. For more information on cookies and how KTA uses them, please see our cookie Policy. Our products currently do not respond to Do Not Track requests.

### **How do third-party apps and plugins work?**

Some third-party applications and services that work with us may ask for permission to access your Information. Those applications will provide you with notice and request your consent in order to obtain such access or information. Please consider your selection of such applications and services, and your permissions, carefully.

Some third parties' embedded content or plugins on our Site and/or Software, such as Facebook "Like" buttons, may allow their operators to learn that you have visited the Site, and they may combine this knowledge with other data they have collected about your visits to other websites or online services that can identify you.

Data collected by third parties through these apps and plugins is subject to each parties' own policies. We encourage you to read those policies and understand how other companies use your data.

### **Will KTA send me emails?**

From time to time, we may want to contact you with information about product announcements, software updates, and special offers. We also may want to contact you with information about products and services from our business partners. You may opt out of such communications at any time by clicking the “unsubscribe” link found within KTA emails and changing your contact preferences. All KTA account holders will continue to receive transactional messages related to our Services, even if you unsubscribe from promotional emails.

### **Does KTA collect information from children?**

KTA does not knowingly collect personal information from children under the age of 18. If we determine we have collected personal information from a child younger than 18 years of age, we will take reasonable measures to remove that information from our systems. If you are under the age of 18, please do not submit any personal information through the Site, Service, and/or Software. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce this Policy by instructing their children never to provide personal information through the Site, Service, and/or Software without their permission.

## **Data storage, transfer, retention, and deletion**

### **Where is my Information stored?**

Information submitted to KTA will be transferred to, processed, and stored in the United Kingdom. When you use the Software on your computing device, User Content you save will be stored locally on that device and synced with our servers. If you post or transfer any Information to or through our Site, Software, and/or Services, you are agreeing to such Information, including Personal Data and User Content, being hosted and accessed in the United Kingdom.

### **How secure is my Information?**

KTA is committed to protecting the security of your Information and takes reasonable precautions to protect it. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure, and as a result, we cannot ensure the security of Information you transmit to us, including Personal Data and User Content; accordingly, you acknowledge that you do so at your own risk.

We use industry-standard encryption to protect your data in transit. This is commonly referred to as transport layer security (“TLS”) or secure socket layer (“SSL”) technology.

Once we receive your data, we protect it on our servers using a combination of technical, physical, and logical security safeguards. The security of the data stored locally in any of our Software installed on your computing device requires that you make use of the security features of your device. We recommend that you take the appropriate steps to secure all computing devices that you use in connection with our Site, Software, and Services.

If KTA learns of a security system breach, we may attempt to notify you and provide information on protective steps, if available, through the email address that you have provided to us or by posting a notice on the Site. Depending on where you live, you may have a legal right to receive such notices in writing.

### **How can I delete my Personal Data from KTA?**

You can remove your Personal Data from KTA at any time by contacting us, and requesting KTA to remove your data from our systems. To contact us, visit: <http://ktafx.com/contact-us/>

### **How long is Personal Data retained?**

You can remove your Personal Data from KTA at any time by deleting your account as described above. However, we may keep some of your Personal Data for as long as reasonably necessary for our legitimate business interests, including fraud detection and prevention and to comply with our legal obligations including tax, legal reporting, and auditing obligations.

### **What happens if KTA closes my account?**

If KTA closes your account due to your violation of the Terms of Service, then you may contact KTA to request deletion of your data. KTA will evaluate such requests on a case by case basis, pursuant to our legal obligations.

### **For EEA users**

KTA uses, processes, and stores Personal Data, including those listed in the “what Information does KTA collect about me?” section, as necessary to perform our contract with you, and based on our legitimate interests in order to provide the Services. We rely on your consent to process Personal Data to send promotional emails and to place cookies on your devices. In some cases, KTA may process Personal Data pursuant to legal obligation or to protect your vital interests or those of another person.

### **What rights do I have, and how can I exercise them?**

Individuals located in the European Economic Area (EEA) have certain rights in respect to their personal information, including the right to access, correct, or delete Personal Data we

process through your use of the Site, Software, and/or Services. If you're a user based in the EEA, you can:

- Request a Personal Data report by submitting a support ticket through [support@ktafx.com](mailto:support@ktafx.com) This report will include the Personal Data we have about you, provided to you in a structured, commonly used, and portable format. Please note that KTA may request additional information from you to verify your identity before we disclose any information.
- Have your Personal Data corrected or deleted. Some Personal Data can be updated by you:
- Object to us processing your Personal Data. You can ask us to stop using your Personal Data, including when we use your Personal Data to send you marketing emails. We only send marketing communications to users located in the EEA with your prior consent, and you may withdraw your consent at any time by clicking the "unsubscribe" link found within KTA emails and changing your contact preferences. Please note you will continue to receive transactional messages related to our Services, even if you unsubscribe from marketing emails.
- Complain to a regulator. If you're based in the EEA and think that we haven't complied with data protection laws, you have a right to lodge a complaint with your local supervisory authority.

#### **Who is KTA data processor?**

Infusionsoft has been appointed as KTA data processor in the EEA for data protection matters, pursuant to Article 27 of the General Data Protection Regulation of the European Union.

#### **Will this Privacy Policy ever change?**

As KTA evolves, we may need to update this Policy to keep pace with changes in our Site, Software, and Services, our business, and laws applicable to us and you. We will, however, always maintain our commitment to respect your privacy. We will notify you of any material changes that impact your rights under this Policy by email (to your most recently provided email address) or post any other revisions to this Policy, along with their effective date, in an easy-to-find area of the Site, so we recommend that you periodically check back here to stay informed of any changes. Please note that your continued use of KTA after any change means that you agree with, and consent to be bound by, the new Policy. If you disagree with any changes in this Policy and do not wish your information to be subject to it, you will need to contact KTA and your data will be deleted.





## Contact us

You may contact us with any questions relating to this Privacy Policy by submitting a help desk or by postal mail at:

**Knightsbridge Trading Academy LTD 7th Floor,  
Tower42, 25 Old Broad Street, London, EC2N 1HQ  
Telephone: (+44) (0) 207 096 0253  
Email: [Dataprotection@ktafx.com](mailto:Dataprotection@ktafx.com)**