

PRIVACY POLICY OF ROYAL CAPITAL MARKETS

RCM collects some Personal Data from its Users.

OWNER AND DATA CONTROLLER

Royal Capital Markets Limited - P.O. Box 1510, Suite 305, Griffith Corporate Centre,
Beachmont, Kingstown, St. Vincent and the Grenadines

Owner contact email: support@rcmtrading.com

TYPES OF DATA COLLECTED

Among the types of Personal Data that RCM collects, by itself or through third parties, there are: Cookies; Usage Data; email address; first name; last name; phone number; address; gender; date of birth; country; ZIP/Postal code.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using RCM.

Unless specified otherwise, all Data requested by RCM is mandatory and failure to provide this Data may make it impossible for RCM to provide its services. In cases where RCM specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by RCM or by the owners of third-party services used by RCM serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through RCM and confirm that they have the third party's consent to provide the Data to the Owner.

MODE AND PLACE OF PROCESSING THE DATA

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of RCM (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

THE PURPOSES OF PROCESSING

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Tag Management, Interaction with live chat platforms, Remarketing and behavioral targeting, Contacting the User, Managing contacts and sending messages and Handling payments.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

Personal Data is collected for the following purposes and using the following services:

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Ads conversion tracking (Google Inc.)

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on the location RCM is accessed from, that connects data from the Google Ads advertising network with actions performed on RCM.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy. Privacy Shield participant.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of RCM, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy – Opt Out.

Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on RCM. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy. Privacy Shield participant.

Display Advertising extension for Google Analytics (Google Inc.)

Google Analytics on RCM might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy – Opt Out.

Contacting the User

Mailing List or Newsletter (RCM)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning RCM. Your email address might also be added to this list as a result of signing up to RCM or after making a purchase.

Personal Data collected: address; email address; first name; last name; phone number.

Contact form (RCM)

By filling in the contact form with their Data, the User authorizes RCM to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: address; country; date of birth; email address; first name; gender; last name; phone number; ZIP/Postal code.

Handling payments

Payment processing services enable RCM to process payments by credit card, bank transfer or other means. To ensure greater security, RCM shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction.

Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

ADVCASH

Payment platform powered by ADV PROJECT LTD.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

FasaPay

FasaPay is a product by Fasa Centra Solutions Ltd.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

PAYEER

PAYEER – electronic wallet

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Perfect Money

Perfect Money - Payment system for money transfers

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Remarketing and behavioral targeting

This type of service allows RCM and its partners to inform, optimize and serve advertising based on past use of RCM by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

Remarketing with Google Analytics (Google Inc.)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on the location RCM is accessed from, that connects the tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy – Opt Out. Privacy Shield participant.

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of RCM with the Facebook advertising network.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy – Opt Out.

Twitter Remarketing (Twitter, Inc.)

Twitter Remarketing is a Remarketing and Behavioral Targeting service provided by Twitter, Inc. that connects the activity of RCM with the Twitter advertising network.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy – Opt Out.

Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of RCM with the Facebook advertising network.

Personal Data collected: Cookies; email address.

Place of processing: US – Privacy Policy – Opt Out.

Twitter Tailored Audiences (Twitter, Inc.)

Twitter Tailored Audiences is a Remarketing and Behavioral Targeting service provided by Twitter, Inc. that connects the activity of RCM with the Twitter advertising network.

Personal Data collected: Cookies; email address.

Place of processing: US – Privacy Policy – Opt Out.

Google Ads Remarketing (Google Inc.)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on the location RCM is accessed from, that connects the activity of RCM with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data collected: Cookies; Usage Data.

Place of processing: US – Privacy Policy – Opt Out. Privacy Shield participant.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on RCM in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Inc.)

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on the location RCM is accessed from.

Personal Data collected: Usage Data.

Place of processing: US – Privacy Policy. Privacy Shield participant.

FURTHER INFORMATION ABOUT PERSONAL DATA

- Marketing Communications

Official RCM marketing communication channels:

Client Terminal internal mail

SMS

Mobile push notifications

Web push notifications

Instant Messenger (Viber, Telegram, Facebook Messenger etc.)

- TLS data security/encryption

RCM uses Transport Layer Security (TLS) encryption (also known as HTTPS) for all transmitted data. All the data are sent over an encrypted TLS 1.2 connection. In no case card(s) data are saved nor stored within the infrastructure of RCM.

THE RIGHTS OF USERS

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of RCM or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, RCM may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, RCM and any third-party services may collect files that record interaction with RCM (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

RCM does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within RCM and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through RCM (or third-party services employed in RCM), which can include: the IP addresses or domain names of the computers utilized by the Users who use RCM, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using RCM who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of RCM. The Data Controller, unless otherwise specified, is the Owner of RCM.

RCM (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by RCM as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small piece of data stored in the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to RCM, if not stated otherwise within this document.