



## SBC Privacy Policy ENG

### **SBC Privacy Policy**

**Last version: 4 Feb 2020**

This Privacy Policy explains how SBC and its Affiliates (“SBC”) collects, uses, shares, and protects user information obtained through our website [www.smartfundlimited.com](http://www.smartfundlimited.com) hereinafter: “Website”). The terms “we,” “us,” and “our” refer to SBC and its affiliates.

In this context, personal data means all detailed information about personal or factual circumstances of a specific or identifiable natural person, such as e.g. name, telephone number or address. We process your personal data either within our business relation if you are an SBC customer or when you are visiting our website for informative purposes. In addition to that - if necessary, for providing our services - we transfer personal data to other companies within the SBC Affiliates or other third parties who process your data permissibly (e.g. to execute orders or contracts or because of your given consent).

Furthermore, we process personal data coming from publicly accessible sources (e.g. records of debtors, trade registers, registers of associations, media, press, internet). The collecting and processing of publicly available data is permitted.

By using the Website, you consent to the data practices described in this Privacy Policy.

On occasion, SBC may revise this Privacy Policy to reflect changes in law or our personal data collection and use practices. If material changes are made to this Privacy Policy, the changes will be announced by posting on the site. We will ask for your consent before using your information for any purpose that is not covered in this Privacy Policy.

The latest privacy policy has incorporated elements from the General Data Protection Regulation (GDPR) as we act in accordance to its personal information processing rules within the European Economic Area (EEA).

### **DATA PROCESSING**

Amongst others, the following data will be collected, used and processed by SBC for the purpose of opening a current account (“Sign-up”) and using the Services of SBC:

- First name and surname
- Date of birth
- Place of birth
- Email address
- Nationality
- Registered address
- Mobile telephone number
- Tax-ID



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- Identification document including:
  - Type of identification document
  - Issue date
  - ID number
  - And issuing authority

Please note that it is not possible to open an account, if you don't provide your personal data.

### **INFORMATION SBC COLLECTS**

#### **We want you to understand the types of information we collect when you register for and use SBC's services**

Information you provide to us at registration

When you create a SBC Account, you provide us with personal information that includes your contact information (Email Address, name, and a password). You can also choose to add a phone number for SMS or Google Authenticator account to be used for 2FA verification for improved security.

#### **Service Usage Information**

Through your use of the Website, we also monitor and collect tracking information related to usage such as access date & time, device identification, operating system, browser type and IP address. This information may be directly obtained by SBC or through third party services. This service usage data helps us our systems to ensure that our interface is accessible for users across all platforms and can aid during criminal investigations.

#### **Transaction Information**

For all personal and enterprise user accounts, we collect transaction information including deposit snapshots, account balances, trade history, withdrawals, order activity and distribution history. This transaction data is monitored for suspicious trading activity for user fraud protection, and legal case resolution.

### **WHY DOES SBC COLLECT THIS INFORMATION**

#### **To provide and maintain our services**

We use the information collected to deliver our services and verify user identity. We use the IP address and unique identifiers stored in your device's cookies to help us authenticate your identity and provide our service. Given our legal obligations and system requirements, we cannot provide you with services without data like identification, contact information and transaction-related information.



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### **To protect our users**

We use the information collected to protect our platform, users' accounts and archives.

We use IP addresses and cookie data to protect against automated abuse such as spam, phishing and Distributed Denial of Service (DDoS) attacks.

We analyse trading activity with the goal of detecting suspicious behavior early to prevent potential fraud and loss of funds to bad actors.

### **To comply with legal and regulatory requirements**

Respect for the privacy and security of data you store with SBC informs our approach to complying with regulations, governmental requests and user-generated inquiries. We will not disclose or provide any personal information to third party sources without review from our legal case team and/or prior consent from the user.

### **To measure site performance**

We actively measure and analyse data to understand how our services are used. This review activity is conducted by our operations team to continually improve our platform's performance and to resolve issues with the user experience.

We continuously monitor our systems' activity information and communications with users to look for and quickly fix problems.

### **To communicate with you**

We use personal information collected, like an email address to interact with users directly when providing customer support on a ticket or to keep you informed on logins, transactions, and security. Without processing your personal information for confirming each communication, we will not be able to respond to your submitted requests, questions and inquiries. All direct communications are kept confidential and reviewed internally for accuracy.

### **To enforce our Terms of Use and other agreements**

It is very important for us and our customers that we continually review, investigate and prevent any potentially prohibited or illegal activities that violate our Terms of Service. For the benefit of our entire user base, we carefully enforce our agreements with third parties and actively investigate violations of our posted Terms of Use. SBC reserves the right to terminate the provision of service to any user found engaging in activities that violate our Terms of Use.



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### **HOW DOES SBC PROTECT USER DATA?**

SBC has implemented a number of security measures to ensure that your information is not lost, abused, or altered. Our data security measures include but are not limited to: Secured Sockets Layered encryption technology, pseudonymisation, internal data access restrictions, and strict physical access controls to buildings & files.

Please note that it is impossible to guarantee 100% secure transmission of data over the Internet nor method of electronic storage. As such, we request that you understand the responsibility to independently take safety precautions to protect your own personal information.

If you suspect that your personal information has been compromised, especially account and/or password information, please lock your account and contact SBC customer service immediately.

### **RIGHTS**

If you want to limit the use or disclosure of your data, for the exercise of these rights you must send an email to the following address [contacto@smartfundlimited.com](mailto:contacto@smartfundlimited.com) with the subject "REQUEST FOR LIMITATION OR DISCLOSURE OF DATA". Additionally, it must contain the following information.

1. Name
2. Statement of facts (brief explanation and request).
3. Email address to communicate response to request.
4. Identification

### **CONTACT US**

We are committed to respecting the freedoms and rights of all our SBC users who have placed their trust in our service. If you should have any questions or concerns regarding this Privacy Policy, please contact us:

#### **Customer Service**

[contacto@smartfundlimited.com](mailto:contacto@smartfundlimited.com)

**Whatsapp: +52 1 55 8458 5425, +52 55 8444 1102**