

GOLDEN TRADER

PRIVACY NOTICE

Effective date	25 September 2026
Version	1.0
Jurisdiction	Saint Lucia

Privacy at a glance. We collect information needed to open and operate accounts, verify identity, process payments, provide trading services, prevent fraud and meet legal obligations. We do not sell personal data. This Notice explains what we collect, why we use it, who receives it, how long it is kept and the choices available to you.

Golden Trader Ltd
Company No. 2025-00610
Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay,
Gros-Islet, Saint Lucia
<https://golden-trader.com>
Privacy requests: info@golden-trader.com

Contents

1. Who we are
2. Scope of this Notice
3. Personal data we collect
4. How we obtain personal data
5. Why we process personal data
6. When providing data is mandatory
7. Verification, profiling and automated controls
8. Who receives personal data
9. International transfers
10. Security
11. Retention
12. Your rights and choices
13. Marketing communications
14. Cookies and online technologies
15. Children
16. Third-party services and links
17. Changes to this Notice
18. Contact and complaints
- Schedule 1 - Processing summary

This Notice should be read with the Client Service Agreement, Cookie Notice, AML/KYC Policy and any product, payment or promotion terms that apply to you. It does not replace those documents.

1. Who we are

1.1 Golden Trader Ltd is incorporated and registered in Saint Lucia as an international business company under Company No. 2025-00610, with its registered office at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

1.2 For the personal data described in this Notice, Golden Trader Ltd generally acts as the data controller, meaning that it determines why and how the data is processed. Certain service providers may act as independent controllers for their own legal or operational purposes.

1.3 Questions and requests concerning privacy may be sent to info@golden-trader.com.

2. Scope of this Notice

2.1 This Notice applies to visitors to golden-trader.com, applicants, current and former clients, authorised users, beneficial owners, directors, representatives, introducers, partners, prospects and people who communicate with us.

2.2 It covers the website, client portal, trading platform, mobile or web applications, account services, support channels, promotions, events and related services operated by or for Golden Trader.

2.3 It does not govern a third party's independent processing. A bank, card network, payment provider, identity verification provider, platform provider or social network may provide its own privacy notice.

3. Personal data we collect

3.1 Identity and profile data: full name, date and place of birth, nationality, gender where required, photograph, signature, government identification numbers and copies, residency, occupation, employer and account preferences.

3.2 Contact data: residential and mailing address, email address, telephone number, language and communication preferences.

3.3 Verification and compliance data: liveness images or video, facial comparison results, proof of address, tax information, source of funds and wealth, expected activity, risk assessments, sanctions, politically exposed person and adverse media screening results, and information concerning suspected fraud or unlawful conduct.

3.4 Corporate and relationship data: company documents, registered and operating addresses, business activity, ownership and control, directors, authorised persons, ultimate beneficial owners, powers of attorney, board approvals and details of introducers or affiliated accounts.

3.5 Financial and payment data: bank, card, payment account or digital wallet details; deposits, withdrawals, refunds, chargebacks and payment-provider references. Full payment-card information may be collected directly by a payment provider rather than stored by us.

3.6 Trading and account data: account numbers, balances, positions, orders, prices, instruments, volume, leverage, margin, profit and loss, commissions, swaps, bonuses, rebates, platform logs, server records and trading behaviour.

3.7 Communications: emails, forms, chats, support tickets, messaging history, call recordings where enabled, complaints, survey responses and notes created while providing support or account management.

3.8 Technical and usage data: IP address, device and browser type, operating system, identifiers, login history, timestamps, approximate location, pages viewed, referral source, cookie identifiers, crash data, security events and portal or platform activity.

3.9 Marketing and event data: campaign source, interests, attendance, communication preferences, response to promotions and information available from professional or social networking channels where lawfully used.

3.10 We do not intentionally collect data that is unrelated to the services. Please do not send sensitive information unless we request it for a stated purpose.

4. How we obtain personal data

4.1 We collect data directly from you when you browse the website, apply for or operate an account, upload documents, trade, make payments, communicate with us, attend an event or participate in a promotion.

4.2 We may receive data from an authorised representative, company officer, introducing broker, affiliate, referrer, joint account holder or another person connected with your application or account.

4.3 We may obtain information from identity verification and screening providers, banks, payment services, trading and technology providers, fraud-prevention services, public registers, sanctions lists, public websites and lawful commercial databases.

4.4 Where another person supplies your data to us, that person should have authority to do so and should make this Notice available to you.

5. Why we process personal data

5.1 We process data only where there is a lawful and relevant purpose. Depending on the circumstances, processing may be necessary to enter into or perform a contract, comply with law, pursue a legitimate business interest, establish or defend legal claims, protect vital interests, or act on your consent where consent is appropriate.

5.2 Our principal purposes are to assess and open accounts; verify identity and authority; conduct KYC, AML, sanctions and fraud checks; provide the client portal and trading platform; execute and record transactions; administer margin and risk controls; process deposits and withdrawals; provide support; communicate service notices; handle complaints; maintain security; keep business and evidential records; improve services; and meet legal, tax, accounting or court requirements.

5.3 Our legitimate interests include protecting clients and systems, preventing misuse, managing financial and operational risk, maintaining accurate records, understanding service performance, improving products, and communicating relevant services. We consider the impact on individuals before relying on legitimate interests.

5.4 Consent is used only where processing genuinely depends on choice, for example certain optional marketing, non-essential cookies or biometric processing where consent is required. You may withdraw consent, but withdrawal does not affect processing already carried out lawfully or processing based on another lawful ground.

5.5 We do not treat use of the website or acceptance of the Client Service Agreement as blanket consent to every form of data processing.

6. When providing data is mandatory

6.1 Some information is required to verify identity, assess eligibility, create and secure an account, process payments or provide trading services. Fields or requests may be marked as mandatory.

6.2 If required data is not provided, is inaccurate or cannot be verified, we may be unable to open or maintain an account, process a transaction or withdrawal, offer a feature, or comply with a request. We may restrict or close the account where appropriate.

7. Verification, profiling and automated controls

7.1 We and our providers may use automated tools to check document authenticity, extract document data, compare facial images, assess liveness, screen sanctions and politically exposed person lists, detect fraud, monitor account security and identify unusual payment or trading activity.

7.2 These tools may produce a score, match or alert. A result may cause an application or transaction to be referred for additional review, delayed, restricted or rejected.

7.3 Where a decision with significant effect is based solely on automated processing and applicable law gives you a right to human review, you may request that review by contacting us. We may still be required to retain fraud and compliance records.

7.4 Biometric data, including facial images and liveness data, is processed only where necessary for identity and fraud-prevention purposes and subject to additional controls. Depending on the provider, the underlying images may be stored by the provider for an approved retention period.

8. Who receives personal data

8.1 We may disclose relevant data to companies supporting our services, including CRM and client-portal providers, MT5 and hosting providers, identity verification and screening vendors, banks, payment processors, digital-asset service providers, liquidity and execution providers, customer-support, communications and analytics vendors, cybersecurity providers, auditors and professional advisers.

8.2 We may share data with introducing brokers, affiliates or account representatives where needed to administer a disclosed relationship, calculate commissions, support the account or investigate a complaint. We limit access to information reasonably required for that role.

8.3 We may disclose information to courts, law-enforcement bodies, tax authorities, government agencies, data-protection authorities or other competent bodies where required or lawfully requested, or where needed to protect rights, property, clients, staff or the public.

8.4 Data may be disclosed in connection with a merger, financing, restructuring, sale of assets or business transfer, subject to confidentiality and lawful-use restrictions.

8.5 We do not sell or rent personal data for another party's independent marketing.

9. International transfers

9.1 Golden Trader serves clients and uses providers in multiple countries. Personal data may therefore be processed outside Saint Lucia or outside your country of residence, including in countries with different privacy laws.

9.2 Before an international transfer, we consider the purpose, recipient, location, sensitivity and available protections. Depending on the transfer, safeguards may include contractual confidentiality and data-protection terms, security requirements, vendor due diligence, access restrictions, encryption or another lawful transfer mechanism.

9.3 No transfer method removes all risk. You may contact us for general information about safeguards relevant to your data, subject to confidentiality and security limitations.

10. Security

10.1 We use administrative, technical and physical measures intended to protect personal data against unauthorised access, alteration, disclosure, loss or destruction. Measures may include access controls, authentication, encryption in transit, monitoring, backups, vendor controls, staff confidentiality and incident response.

10.2 Security is risk-based and no internet transmission or storage system is completely secure. You must protect passwords, one-time codes, devices and account credentials and notify us promptly of suspected compromise.

10.3 If a personal-data incident occurs, we will investigate, contain and remediate it and notify affected individuals or authorities where required by applicable law.

11. Retention

11.1 As a company policy, core client, KYC, payment, trading, communication and account records are generally retained for seven years after the account is closed or the business relationship ends.

11.2 A shorter or longer period may apply where the data is no longer needed, a payment dispute or complaint remains open, fraud or litigation is anticipated, a court or authority requires preservation, or another legal, tax, accounting, security or evidential obligation applies.

11.3 Unsuccessful applications, prospects, website logs, call recordings, cookies and marketing records may follow shorter operational schedules based on purpose and risk.

11.4 When data is no longer reasonably required, we delete, anonymise or securely isolate it, subject to backup cycles and technical limitations.

12. Your rights and choices

12.1 Subject to applicable law and relevant exceptions, you may ask whether we process your personal data, request access to it, ask us to correct inaccurate or incomplete data, or request deletion when the data is no longer required.

12.2 You may object to or request restriction of particular processing, withdraw consent where processing is based on consent, and ask us to stop using your information for direct marketing.

12.3 We may decline or limit a request where identity cannot be verified, the request would affect another person's rights, records must be retained for legal, fraud-prevention or claims purposes, or another lawful exception applies. We will explain the outcome where permitted.

12.4 To exercise a right, email info@golden-trader.com from your registered address and describe the request. We may ask for information needed to verify identity and locate the records. We aim to respond within a reasonable time and within any period required by applicable law.

12.5 There is normally no fee for a reasonable request. A lawful fee or refusal may apply to a request that is manifestly unfounded, excessive or repetitive.

13. Marketing communications

13.1 We may send service messages needed to operate or secure an account. These are not promotional and cannot always be disabled while the account remains active.

13.2 Promotional messages are sent where permitted by law and may be based on consent or a legitimate relationship. You can opt out through an unsubscribe link or by contacting us. We may retain a suppression record so that the preference is respected.

13.3 Opting out of marketing does not prevent account, security, legal or transaction communications.

14. Cookies and online technologies

14.1 Our website and portal may use cookies, pixels, local storage and similar technologies for essential operation, authentication, security, preferences, performance, analytics and marketing.

14.2 Essential technologies may operate without optional consent where they are necessary to provide or secure a requested service. Where required, analytics or advertising technologies are activated only after an appropriate choice.

14.3 Further information, including cookie categories and controls, is provided in our Cookie Notice and any consent tool displayed on the website.

15. Children

15.1 Our services are not intended for anyone under 18 and we do not knowingly open accounts for minors. If you believe a minor has provided personal data, contact us so that we can investigate and take appropriate action.

16. Third-party services and links

16.1 Our services may contain links to websites, applications, payment pages, social networks or platforms operated by third parties. We do not control their independent privacy practices. Review the notice presented by the relevant third party before providing information.

17. Changes to this Notice

17.1 We may update this Notice to reflect changes in law, services, vendors, technology or business operations. The current version and effective date will be published on our website.

17.2 Where a change materially affects how existing personal data is used, we will provide additional notice through the website, portal or registered contact details where reasonably practicable.

18. Contact and complaints

18.1 Privacy questions, requests or complaints should be sent to info@golden-trader.com or delivered to Golden Trader Ltd at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

18.2 Please include your name, registered email, account number if applicable, the nature of the request or concern and relevant dates. Do not send passwords or one-time codes.

18.3 We will review the matter and respond within a reasonable period. You may also have the right to complain to a competent data-protection authority or seek a legal remedy under the law applicable to you.

Schedule 1 - Processing summary

Purpose	Main data	Typical basis
Account application and administration	Identity, contact, profile, corporate and account data	Contract steps; contract performance; legitimate interests
Identity, KYC, sanctions and fraud controls	Identity, biometric, compliance, device, payment and relationship data	Legal obligations; legitimate interests; consent where required
Trading and risk management	Orders, positions, balances, platform logs, device and behavioural data	Contract performance; legitimate interests
Deposits, withdrawals and reconciliation	Identity, bank, card, wallet, transaction and compliance data	Contract performance; legal obligations; legitimate interests
Support, complaints and communications	Contact, account, communication and call-recording data	Contract performance; legitimate interests; legal claims
Website security and analytics	IP, device, cookie, usage and security-event data	Legitimate interests; consent for optional technologies where required
Marketing and promotions	Contact, preferences, campaign source, account relationship and engagement	Consent or legitimate interests, subject to opt-out rights
Legal, tax and recordkeeping	Account, KYC, payment, trading, corporate and communication records	Legal obligations; legal claims; legitimate interests

Privacy contact
 Golden Trader Ltd
 Company No. 2025-00610
 Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia
 Website: <https://golden-trader.com>
 Email: info@golden-trader.com