

# Privacy Policy

This Privacy Policy is designed to give you an idea in what manner GuruTrade collects, stores and uses your personal data.

## Personal Information

GuruTrade respects your privacy and is committed to handling your personal data with transparency and integrity. When processing personal data provided by you, GuruTrade.com is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 ('GDPR').

GuruTrade website includes links to third-party websites. Clicking on those links 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 read the privacy notice of every website you visit.

Your personal data will be collected in accordance with the current legislation and the main purpose of the collection of this information is fulfillment of legal requirement.

If your personal data will be used for any other purpose(s) the accorded consent will be requested.

## Transmission of Information to Third Parties

There is no way third parties can get information about our customers, according to the rules described in the Privacy Policy. Information may be disclosed only upon your request or with your consent. Remember, GuruTrade values its reputation too much to sell your confidential information.

## Transmission of Information to Governing Bodies

In exceptional cases, GuruTrade may disclose customer's personal information to third parties if such disclosure is required by applicable law or other regulations. For example, we will have to disclose personal information to comply with court orders or official inquiries, as well as in the case of the protection of our rights and property.

## What Data GuruTrade Collect and Process

GuruTrade collects two types of data and information from you:

1. Non-Personal Information, using cookies. Detailed information about cookies and how GuruTrade uses them may be found in the section Cookies on this Privacy Policy.

2. Personal Information:

- E-mail, phone number, date of birth, gender. This personal information is not intended for public access and is used solely to improve the level of service, as well as for timely notification of GuruTrade new services and products.
- Name, surname, locality, professional data. This type of personal information is filled in by you consciously and intended for public access.

When setting up an account, GuruTrade will collect your email address. During setup of your account, the account is automatically assigned a number ("ID") that is later used to reference your user account without directly exposing your personal information, that is not intended for public access.

GuruTrade does not require you to provide or use your real name for the setup of a user account.

## Cookies

Cookies are files containing the information that websites use to register traffic (number of visitors). This information from the website server is temporarily saved on the hard disk of your computer or mobile device when you visit the website for the first time and, subsequently, allows the website to recognize your browser.

Cookies usually contain some anonymous information such as the Unique Identification Number that is generated at random. Cookies also remember the country and language preferences you selected. All the information received is confidential and not directly associated with a certain client.

GuruTrade.com uses cookies to define what services are the most interesting services for its clients and to measure visitors' activity on the Company's website. Using cookies, we also identify the most requested advertisements and estimate the popularity of resources related to the potential clients attracting.

Using services of our website, you agree to our use of cookies. All the Internet browsers allow to change cookies settings. You can disable or block cookie files, however, some of them are necessary for the proper functioning of our website.

GuruTrade can perform the following operations / set of operations with the personal data in accordance with applicable law, whether or not by automated means: collection; recording; organisation; structuring; storage; adaption or alteration; retrieval; consultation; disclosure by transmission, dissemination or otherwise making available; alignment or combination; restriction; erasure or destruction.

Your data is processed with the following principles:

(a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

GuruTrade has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, to exercise all relevant rights, queries or complaints to any data protection matter between you and GuruTrade, please in the first instance contact us at [support@gurutrade.com](mailto:support@gurutrade.com).

## Data Storage Terms

GuruTrade will only store your personal information as long as necessary to fulfil the purposes for which the information is collected and processed or — where the applicable law provides for longer storage and retention period — for the storage and retention period required by law.

In case your account is inactive longer than 12 months your personal data will be anonymized (your public account and hyperlink to it will be deleted).

Deletion of GuruTrade account is carried following your request at [support@gurutrade.com](mailto:support@gurutrade.com). In this case your personal data will be marked for deletion except to the degree legal requirements or other prevailing legitimate purposes dictate a longer storage.

If you exercise a right to object to the processing of your personal data, GuruTrade will review your objection and delete your personal data that we processed for the purpose to which you objected without undue delay, unless another legal basis for processing and retaining this data exists or unless applicable law requires us to retain the data.

## Your Rights and Control Mechanisms

The data protection laws of the European Economic Area and other territories grant their citizens certain rights in relation to their Personal Data.

### **Right of Access.**

You have the right to access your personal data that we hold about you, i.e. the right to require free of charge (1) information whether your personal data is retained, (2) access to and/or (3) duplicates of the personal data retained. If the request affects the rights and freedoms of others or is manifestly unfounded or excessive, GuruTrade reserves the right to refuse to act on the request.

### **Right to Rectification.**

If GuruTrade processes your personal data, GuruTrade shall endeavor to ensure by implementing suitable measures that your personal data is accurate and up-to-date for the purposes for which it was collected.

### **Right to Erasure.**

You have the right to obtain deletion by GuruTrade of your personal data. The corresponding request should be sent at [support@gurutrade.com](mailto:support@gurutrade.com).

### **Right to Object.**

When our processing of your personal data is based on legitimate interests according to Article 6(1)(f) of the GDPR / section 2.c) of this Privacy Policy, you have the right to object to this processing. If you object GuruTrade will no longer process your personal data unless there are compelling and prevailing legitimate grounds for the processing as described in Article 21 of the GDPR; in particular if the data is necessary for the establishment, exercise or defense of legal claims.

You also have the right to lodge a complaint at a supervisory authority.

The GDPR also includes the following rights for the clients: the right to be informed; the right to restrict processing; the right to data portability; the right not to be subject to automated decision-making including profiling.

In respect of the client's rights GuruTrade informs you that you are able to exercise the above-mentioned rights if this does not contradict the legal requirements in relation to the Prevention of Money Laundering and Terrorist Financing Laws.

## **Security Technologies**

GuruTrade uses advanced technology for secured connections (SSL) to protect the information you share with us. The SSL Technology provides reliable data protection from interception by third parties. We are constantly improving our security technologies to prevent intrusions into the system.

## **Instructions how to opt-out**

You can opt-out of GuruTrade email marketing, by sending the corresponding request at [support@gurutrade.com](mailto:support@gurutrade.com). You can also use email to send us your requests relating to marketing materials and your right to forward these materials to third parties with marketing purposes.

Last modified: 24 May, 2018.