

PRIVACY POLICY

September 2026

This Privacy Policy pertains to INVIDIATRADE LTD hereinafter (referred to as the “*Company*,” “*we*,” “*us*,” or “*our*”) and the processing of your data. Your use of our Services implies your acknowledgment and consent to our policies and protocols concerning personal information.

For any queries or apprehensions, you can contact us at support@invidiatrade.com.

If you disagree with our policies, we request that you abstain from using our Services.

1 WHAT DATA IS COLLECTED?

- 1.1 We collect personal information from you on a voluntary basis when you register on our Services, express interest in learning about us or our products/services, engage in activities on the Services, or reach out to us.
- 1.2 The personal information we gather is determined by your interactions with us and the Services, the choices you make, and the products/features you utilize. This may encompass, but are not limited to, the following:
 - i. Names;
 - ii. Government-issued identification documents (such as passports and driver’s licenses);
 - iii. Email addresses;
 - iv. Physical addresses; and
 - v. Billing addresses.
- 1.3 We may collect and process personal data through the use of various analytics and advertising services, including but not limited to Google Tag Manager, Google AdSense, and Microsoft Clarity.
- 1.4 This data collection helps us to:
 - i. Analyze User Behavior:

We use Google Tag Manager to manage and deploy marketing tags on our website, enabling us to track user interactions and improve our services.

ii. Advertising Purposes:

Google AdSense allows us to serve personalized advertisements based on user interests and behaviors, helping us to deliver relevant content and improve user experience.

iii. User Insights:

Microsoft Clarity provides us with insights into how users interact with our site, allowing us to understand user behavior, optimize our website, and enhance overall user experience.

2 AUTOMATICALLY COLLECTED DATA

2.1 The types of data automatically collected may include, but is not limited to, the following:

- i. IP address;
- ii. Browser type and version;
- iii. Pages visited;
- iv. Time spent on pages;
- v. Click-through data;
- vi. Other interaction metrics.

2.2 During your visit, use, or navigation of our Services, certain information is automatically gathered by us.

2.3 This information, while not disclosing your specific identity (e.g., name or email address), may include device and usage data such as IP address, browser and device specifications, operating system, language preferences, source URLs, device name, country, location, usage details of our Services, and other technical particulars.

2.4 This information is primarily utilized for ensuring the security and functionality of our Services, as well as for internal analysis and reporting purposes. Similar to other businesses, we employ cookies and similar technologies to gather information.

- 2.5 We automatically collect log and usage data when you use our Services. This pertains to information related to service, diagnostics, usage, and performance, automatically collected by our servers when you access or use our Services. This data, stored in log files, may encompass details such as your IP address, device information, browser type and settings, and information about your activities within the Services (such as timestamps of usage, pages/files viewed, searches conducted, and other actions like feature usage), as well as device event information (such as system activity, error reports, and hardware configurations), based on your interactions with us.

3 USER CONTROL

Users have the option to manage their data preferences through their browser settings or by opting out of personalized advertising through the respective services' privacy controls.

4 PAYMENT INFORMATION

- 4.1 For any purchases, we may collect the necessary data to facilitate your payment, including the payment instrument number and security code associated with your payment method. The storage of all payment information is managed by our payment processors, and you can refer to their respective privacy notices on their websites.
- 4.2 It is of utmost importance that the personal information you provide us is accurate, complete, and current. If there are any changes to your personal information, it is your responsibility to inform us.

5 HOW WE PROCESS YOUR DATA

- 5.1 We engage in the processing of your personal information for various purposes, depending on your interactions with our Services. These purposes encompass facilitating

account creation and authentication, as well as identifying and preventing fraudulent activities.

- 5.2 Additionally, we may utilize your information to solicit feedback and communicate with you regarding your utilization of our Services.
- 5.3 Processing of your information may also be undertaken when it is necessary to safeguard vital interests, such as preventing harm.
- 5.4 We undertake the processing of your personal data only when it is deemed necessary and is supported by valid legal justifications. These justifications may include obtaining your consent, complying with laws, providing services, fulfilling contractual obligations, protecting your rights, or serving our legitimate business interests, as outlined in our Terms and Conditions. This processing also serves to safeguard the Company against fraud.

6 APPLICABILITY TO EU OR UK USERS

For users located in the EU or UK, compliance with GDPR and UK GDPR requires us to specify the legal grounds for processing your personal data. Accordingly, we process your information based on the following legal grounds:

6.1 CONSENT

We may process your information if you have granted us consent to use your personal information for a specific purpose. You retain the right to revoke your consent at any time, and you can do so by reaching out to us through the contact form or sending an email to support@invidiatrade.com.

6.2 LEGITIMATE INTEREST

Your information may be utilized for our legitimate business interests, provided that these interests do not take precedence over your basic rights and freedoms, as outlined in our

Terms and Conditions. This usage is also aimed at protecting the Company against fraudulent activities.

6.3 LEGAL OBLIGATION

We may manage your information to meet our legal obligations, which may involve collaboration with law enforcement or regulatory bodies, safeguarding our legal rights, or presenting your information as evidence in relevant legal proceedings.

6.4 VITAL INTERESTS

6.4.1 Processing of your information may occur if it is essential to safeguard your vital interests or those of others, particularly in emergency situations where safety is at risk.

6.4.2 **For residents in Canada, this section is applicable.** We can process your information only if you have expressly consented for a specific purpose or if it can be reasonably assumed from the circumstances (implied consent). However, you retain the right to revoke this consent at any time.

6.4.3 In exceptional cases permitted by law, we may process your information without your consent, such as:

- i. In cases where obtaining consent promptly is impractical but is in an individual's best interests;
- ii. For the purpose of fraud investigation and prevention;
- iii. When required for specific conditions related to commercial transactions;
- iv. In situations where information is included in a witness statement for the evaluation and settlement of insurance claims;
- v. For the identification of injured, ill, or deceased individuals and communication with next of kin;
- vi. When there are reasonable grounds to believe an individual has been or may be a victim of financial abuse;
- vii. When collection and use with consent would compromise information availability or accuracy and collection is necessary for breach of agreement or violation investigation;
- viii. When disclosure is mandated by law, such as through a subpoena or court order;

- ix. When information is created in the course of employment, business, or profession and aligns with the original purpose of the information;
- x. When the sole purpose is for journalism, art, or literature;
- xi. When information is publicly available and required by law.

7 SHARING PERSONAL INFORMATION

Your personal information may be shared under the following circumstances:

7.1 BUSINESS TRANSFERS:

During negotiations or the completion of a merger, sale of assets, financing, or acquisition involving our company or a part thereof, your information may be shared or transferred to another company.

7.2 WORKING WITH VENDORS

To deliver the Services, the Company collaborates with various third-parties, and your personal information may be shared to ensure adherence to the Company's Terms & Conditions and to prevent fraud or manipulation involving the Company or third-parties.

7.3 USE OF COOKIES AND TRACKING TECHNOLOGIES

The utilization of cookies and other tracking technologies (e.g., web beacons, pixels) may enable the access or storage of information. Detailed information on our usage of these technologies and options to decline certain cookies can be found in our Cookie Notice.

We employ various tracking methods such as Google AdWords, Meta Advertising, and Google Analytics to collect and store data on user interactions with our websites.

8 DATA RETENTION PERIOD

- 8.1 We retain your personal information only for the duration necessary or as permitted by law, which includes reasons such as tax, accounting, or other legal obligations.

- 8.2 Once our business no longer requires the information, we will either delete or anonymize your personal data. If deletion is not immediately possible, we will securely store it and limit access until it can be securely deleted.

9 ENSURING INFORMATION SECURITY

- 9.1 We have implemented necessary and reasonable technical and organizational measures to safeguard the personal information in our possession. However, it is important to note that the Internet and information storage technology are not infallible, and as such, we cannot guarantee that your information will remain inaccessible, unaltered, or free from unauthorized access by third parties.
- 9.2 While we make every effort to safeguard your personal information, it remains your responsibility to ensure the security of the information you transmit through our Services. It is advisable to exercise caution when utilizing the Services and only do so in a secure environment.

10 INFORMATION COLLECTION REGARDING MINORS

We do not deliberately collect information from or target individuals under the age of 18. By utilizing our services, you confirm that you are eighteen (18) years old or older, or the parent/guardian of a minor using the services with your consent.

If, at any point, we identify any personal information from minors, we will promptly disable their account and expunge the data from our records. Should you become aware of any information collected from minors, please reach out to us at support@invidiatrade.com.

11 YOUR PRIVACY ENTITLEMENTS

- 11.1 In regions governed by applicable data protection laws, such as the EEA, UK, and Canada, you hold specific rights, including:
- i. Requesting access to and a copy of your personal information.
 - ii. Seeking correction or deletion of your information.

- iii. Restricting the processing of your personal information and, if applicable, data portability.
- iv. Objecting to the processing of your personal information under certain circumstances.

11.2 If you wish to exercise these rights, please get in touch with us. If you reside in the European Economic Area or the UK and believe that your personal information is mishandled, you can lodge a complaint with your local data protection authority.

- i. Find their contact details at: https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.
- ii. For individuals in Switzerland, information on data protection authorities can be found at: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

12 WITHDRAWING YOUR CONSENT

If your personal information is processed based on your consent, whether expressed or implied in accordance with relevant laws, you have the right to withdraw it at any time.

13 OPTING OUT OF MARKETING AND PROMOTIONAL COMMUNICATIONS

To discontinue receiving our marketing and promotional emails, simply click the unsubscribe link in the emails we send you. This action will remove you from our marketing lists. Note that non-marketing communications, such as service-related updates, account administration, and responses to your service requests, may still be sent.

14 ACCOUNT INFORMATION

To review the information in your account, log into your profile. For updates or closure of account information, please contact us using the provided contact details.

15 NOTE

Upon your request, we will suspend or permanently close your account and information from our active databases. Nevertheless, certain data may be retained in our records for purposes such as fraud prevention, issue resolution, investigations, enforcement of legal terms, and compliance with legal requirements.

16 COOKIES AND SIMILAR TECHNOLOGIES

Typically, web browsers are set to accept cookies by default. While you can choose to remove or reject cookies, be aware that doing so may affect certain features or services within our platform.

To opt out of interest-based ads presented by advertisers on our Services, visit <https://youradchoices.com/control>.

For inquiries or comments regarding privacy matters, please email us at support@invidiatrade.com

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17 CONTROLS FOR DO-NOT-TRACK FEATURES

Many web browsers, mobile operating systems, and apps come equipped with a Do-Not-Track (“DNT”) feature, indicating your preference to avoid monitoring and collection of your online browsing activities. However, as there is currently no universally agreed-upon technology standard for DNT, we do not presently respond to DNT browser signals or any other mechanism expressing your preference not to be tracked. If a future standard for online tracking is established, we will update this privacy notice and keep you informed.

18 IDENTITY VERIFICATION PROCEDURE

- 18.1 In order to validate your identity upon receiving your request, we may need to confirm that you are the individual whose information is in our records. This verification process may necessitate the solicitation of additional information from you, aligning with the details we already possess.
- 18.2 Depending on the nature of your request, we may seek specific information for verification or initiate contact using a previously provided communication method, such as phone or email. Other verification methods may be employed as per the circumstances.
- 18.3 The personal information furnished in your request will exclusively be utilized for the purpose of verifying your identity and confirming your authority to make the request. We strive to minimize the necessity for requesting additional information for verification. However, if our existing information proves inadequate for identity verification, we may request additional details for both identity verification and security and fraud prevention. Once the verification process concludes, any supplementary information you provided will be promptly deleted.

19 AMENDMENTS AND UPDATES

This privacy notice may undergo periodic revisions, with the updated version indicated at the very beginning of the Policy. The changes take effect immediately upon release. Significant modifications may be communicated through a prominent notice or notification to you. It is advisable to regularly review this privacy notice to stay informed about how we protect your information.
