

# Privacy Policy

**In brief:** We are Decode Global Limited ("Decode Global," "we" or "us"). We respect your privacy and work hard to protect the confidentiality of information that you give us. We will only share your personal data with third parties in the event that it's needed for the provision of services and data you have requested (explained in detail in this privacy policy).

## About Us

Decode Global is the data controller responsible for your personal data and is the sole owner of the [my.decodeex.com](https://my.decodeex.com) website ("Website"), Decode Global mobile and desktop applications, Decode Global services (each, a "Service") and all of the information collected on it. Decode Global collects information from users in several ways (explained in detail in this privacy policy).

This privacy policy applies to personal data that we collect from you when you visit this Website, create an account, use our applications or services ("you" or "your" being interpreted accordingly). It provides information on what personal data we collect, why we collect personal data, how it is used, the lawful basis on which your personal data is processed, how it is stored, and how we share information.

As used in this privacy policy, "personal data" means any information that relates to you from which you can be identified.

By using our Service or submitting your personal data, you are agreeing to accept the terms of this privacy policy, so please read it carefully. If you disagree with this privacy policy at any point or time, you should stop using our Services and delete your user account.

## Updates

We may update this privacy policy at our discretion from time to time by posting a new version on our website. You should check our website occasionally to ensure any changes made are suitable for you. If required by applicable law, you will be informed of any significant changes made to the privacy policy.

The current version of this privacy policy was published on October 19, 2023.

## Personal data that we collect

There is no need to create an account when searching and viewing information from certain markets, such as symbols, quotes, financial data, as well as ideas and publicly available data of Decode Global users.

### Data we receive from you

#### User Accounts

If you decide to create an account, you will need to provide us with some personal data so we can provide you with access to our additional services that users benefit from. You may also elect to provide us with additional information about you, as described below.

During registration you will be required to provide us with:

- your username, email address;
- your first name, last name and date of birth
- if you want to buy a subscription, we will need your first name, last name and postal address.

In some cases, you may need to provide and verify your phone number. You can also add additional information about yourself in the profile settings.

The following information will be publicly displayed:

- username, the image you have elected to provide as your user avatar, signature

The following information will not be publicly displayed:

- your first and last name, phone number and email.

Our third party payment processor will also process information about your payment card and bank account information or payment account information that we require for the purpose of recording and processing your account registration.

#### Contact data

We also process any personal data you choose to give when corresponding with us by phone, email, or otherwise visiting and interacting with this Website or any other services we operate.

#### Partners data

We also process personal data you choose to give at registration and connection to the Orion Academy (for more information please see Orion Trading Academy).

#### Cookies and other technologies

We use browser cookies (small text files placed on your device) to administer our Site, gather and analyze statistical information, ensure security, to fight spam, and for advertising purposes. Cookies allow us to provide you with a better user experience

when you browse our Website and also helps to improve its features. More detailed information on the use of cookies can be found in our Cookies Policy.

## **Log files**

Like most websites, we use web server log files. Records in our log files include internet protocol (IP) addresses, browser types, internet service providers, referring pages, exit pages, platform types, and date/time stamps. We use web server log files to administer the site, provide broad traffic information for site planning purposes, and to ensure that our terms of service agreement is being adhered to. Note that IP addresses are not tied to personal data in our web server log files.

## **Device information**

We collect the following information about the devices you use to interact with our services: IP address of the device (from which we can also infer the country you are connecting from), device type, operating system, application and browser version. We collect this information to prevent spam and abuse of our services. IP addresses may be considered personal data in certain jurisdictions and will be treated in accordance with this privacy policy.

## **Analytics**

When you are using our Website, mobile and desktop applications, or widgets we provide to another site, we may collect analytics information automatically. This information may include your general device information, device identifiers (for example, Google Advertising ID, if you are using an Android device, or Advertising Identifier (IDFA), if you are using an iOS device), network information, website, and application interaction events. We collect pseudonymous data only and this analytic information does not include any personal identifiable information from your profile. We use this information to analyze and improve the work of our services and applications, and to develop, test, and improve our service further. For this purpose we may use internal analytic as well as third party service providers. For further details about our use of third party service providers, please refer to the Analytics providers section below.

## **How personal information is used**

We use personal data in various ways that are necessary to provide the services you intend to use, certain legitimate interests, and as a necessity in order to comply with applicable law, as further described below.

We do not generally rely on your consent to allow us to process your personal data if there is another lawful ground available. If we do rely on your consent, we will make this clear to you at that time.

## **Profile**

A profile is a set of information for each individual user that details his/her viewing preferences. User settings (chart settings, toolbars, buttons, etc.) are kept solely for the purpose of customizing the user's experience when using the Website, applications or user accounts. We do not share private profile settings with any third parties.

Note that when you create an account, other users or visitors may access your public profile and see any information you have made publicly available about yourself.

## **User account and profile operations**

We use your contact details, such as username, email address, or phone number, in the following ways:

- to authenticate your user account, ensure its security along with the security of our services, and to prevent spam, fraud, and abuse;
- to acknowledge, confirm, and deal with your user account;
- to send all new users a welcome activation email to verify their email address;
- (For Paid Users) to provide you with subscription services and contact you regarding your use of such services. This is necessary for us to implement your requests; and
- Paid Users will also receive a notification email from our payment processor if there are any issues regarding billing their cards for subscriptions. Users cannot opt out of these messages, though they can delete their account.

## **User account deleting**

You may refuse to use our Website and/or application and may ask us to delete your account by request support tickets. Your account will be deleted after 14 days. During this time, you can stop the deletion process at any time.

Please note that if you have requested your account to be deleted, we will delete the subsequent personal data you have supplied us. However some data, such as published ideas/scripts and messages sent to other users, will be saved as they have already integrated into our system. This data must be stored to maintain the integrity of the platform, as well as for legitimate business processes, including audits and security purposes.

Note that search engines, as well as third parties, can keep copies of your publicly available information once your account has been deleted. It should also be noted that published ideas will remain on the site and messages sent to other users cannot be deleted.

## **Marketing**

We may send you marketing emails about our products or services that are similar to the products or services you are subscribed to, including information about events and other promotions we feel may interest you. This is unless you have indicated to us that you do not wish to receive communications in this manner. We will send you other promotional information by email only with your consent, which was given at the time

you provided us with your personal data. Users can opt out of receiving marketing communications at any time by clicking "unsubscribe" in one of the emails.

## **Service-Related Announcements**

On rare occasions, it may be necessary to send out service-related announcements. For instance, if our service is interrupted for a prolonged period or a major functionality upgrade is released, we might send all users an email message.

## **Customer Service**

When you open a support ticket, we use your contact details as well as information about your device, server logs, a description of the problem, along with any other supporting materials (videos, screenshots, etc.) to help resolve the issue(s).

## **API**

If you are using our API (Application Programming Interface) services, then we may process your personal data in order to be able to provide and support those services.

## **Legitimate interests**

We will process your personal data as necessary for certain legitimate business interests, which include the following:

- where we are asked to respond to any of your inquiries, comments, or grievances;
- to administer our services in order to better understand how visitors interact with the Website and application, and ensure that they are presented in the most effective manner for you and your computer/device;
- to develop and improve our mobile applications;
- to share personal data among our affiliated businesses for administrative purposes, provide subscription services, and in relation to our sales and marketing activities, except where we require your consent, as described above;
- to send you information about our products or services that are similar to the products or services you subscribed to (unless you have refused or opted out of receiving these emails at the time you provided us with your email address or you have indicated to us that you do not wish to receive communications in this manner). Our legitimate interest is to ensure our marketing is relevant to you, so we may process your data to send you information on our products or services that is specifically tailored to your interests;
- we may anonymize, pseudonymize, aggregate and de-identify the data that we collect and use this data for our own internal business purposes, including sharing it with our business partners, our affiliated businesses, agents and other third parties for commercial, statistical and market research purposes. For example, to allow those parties to analyse patterns

- among groups of people and conducting research on demographics, interests, and behavior;
- for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, and as part of our efforts to keep our Website, network, and information systems secure; and
  - to (a) comply with legal obligations, (b) respond to requests from competent authorities; (c) enforce our Terms of Use; (d) protect our operations or those of any of our affiliated businesses; (e) protect our rights, safety or property, and/or that of our affiliated businesses, you or others; and (f) enforce or defend legal rights, or prevent damage. This means we can store and disclose your information to law enforcement authorities, state, or government agencies if we establish that such disclosure is necessary to comply with the law. This includes responses to court orders or subpoenas, as well as other judicial or regulatory processes.

As used in this privacy policy, “legitimate interests” means the interests of Decode Global and our affiliated businesses in conducting and managing our business. When we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We do not use personal data for activities where our interests override the impact they may have on our users, unless we have their explicit consent or those activities are otherwise required or permitted by law. You have the right to object to the processing of your personal data that is based on our legitimate interests at any time, on grounds relating to your particular situation.

## When would we share personal information

We share your personal data with third parties in the following situations:

- **Service providers:** Decode Global, like many businesses, occasionally engages with selected third parties who act on our behalf to support our operations, such as (i) card processing or payment services (ii) IT suppliers and contractors (i.e. data hosting providers or delivery partners) as necessary to provide IT support and enable us to provide subscription services and other goods/services available on this Website or to users, (iii) web and mobile analytics providers, (iv) providers of digital advertising services, and (v) providers of marketing and sales software solutions. Pursuant to our instructions, these parties may access, process or store your personal data in the course of performing their duties to us and solely in order to perform the services we have hired them to provide.
- **Payment information:** Paid Users must provide payment information (name, postal address, payment card information or payment account information). This information is used for billing purposes only and is processed by our payment processors. When you are making a payment,

we do not have access to your payment card information. Should we have any issues with processing an order, the email address you have provided will be used to contact you.

- **Decode Global affiliated businesses:** In order to provide the services you request from us, our affiliated businesses may access and process the information which we collect from you for the purposes described above, including offering products and services to you. Our affiliated businesses will only use your data for the purposes for which we originally collected said data.
- **Business transfers:** If we sell our business or our company assets are acquired by a third party, personal data held by us about our general account users, subscription account users or customers may be one of the transferred assets.
- **Administrative and legal reasons:** If we need to disclose your personal data (i) to comply with a legal obligation and/or judicial or regulatory proceedings, a court order or other legal process, (ii) to enforce our Terms of Use, or other applicable contract terms that you are subject to, or (iii) to protect us or our contractors against loss or damage. This may include, but is not limited to, exchanging information with the police, courts or law enforcement organisations.
- **Advertising:** We display advertising on the Website and may use remarketing and tracking features. Remarketing features allow us to display advertising in a more targeted manner in order to present advertisements of interest to users, based on their activity on other websites. Tracking features allow us to collect information about impressions, ad clicks and certain actions that users complete through our Website. This data also helps us evaluate the performance of ad campaigns. Note that we collect pseudonymous data only.
- Note that we do not share any personal information with our advertisers. They can only access general statistics that include the amount of impressions their ads have generated as well as clicks.

## Public information on our site

### Public Profile

When you create your profile on our Service, other users or visitors may access your public profile and see any information you have made available about yourself. When browsing for trading ideas, they will only be able to view your market information (i.e. published ideas and scripts, markets allocation, top mentioned Symbols, etc.), social information (i.e. followers and following lists along with the ideas that you follow and comment on), contact information (i.e. your About section, avatar, links to your social

media accounts, website, etc.), your community status (i.e. Moderator or Pro badges, statistical information such as reputation points, views, likes, followers, registration date, as well your last visit date). Your email address, however, will not be visible (unless you choose to make it visible).

## **Chats and Private Messages**

When you communicate with other users in public and private chats, we store and process your messages and any related information. We check links to make sure there is no malicious software or content as well as to detect spam and prohibited images/text. When you use private messages to communicate, please keep in mind that the recipients have a copy of your correspondence as well. This will continue to be the case even if you delete such correspondence from your account. Recipients can copy, store and/or reshare these messages. Be constantly vigilant of this.

## **Security of personal data**

We use technical and organizational safeguards to protect your personal data and require third parties with whom we work to do the same.

We use Transport Layer Security (TLS) encryption technology in order to protect certain information that you submit to us. This technology protects you from having your information intercepted by anyone while it is being transmitted to Decode Global or payment processor. While on a secure page, such as our order form, the "lock" icon in the browser window is displayed, confirming that a secure and encrypted connection has been established with the Website. We work hard to ensure that our Service is secure and that we meet industry standards. We also use other safeguards, such as firewalls, authentication systems (i.e. passwords, and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data. If you have chosen to create an account, you are responsible for doing everything you reasonably can to keep your access details secret. You must not share these details with anyone else.

We also do our best to protect user information offline. All of our users' personal information is restricted to our offices. Only employees who need to see the information to perform their jobs are allowed to access it.

The servers that store personal data are located in a secure environment in a locked facility.

We are constantly improving the ways we secure, store, and process the data we collect, including the addition of physical security measures that help us counter unauthorized access to our systems. However, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee its absolute security.



## Children and sensitive personal data

This Website is not directed towards children who are under the age of 18. We do not knowingly contact or collect personal information from children below the age of 18 years, or sensitive personal data ("racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation," etc.). If you believe we have inadvertently collected such information, please contact us immediately so that we can either obtain special consent or delete the information.

## Third Party Sites

### Links to other sites

At our discretion we may add links (web links) to other websites from our Website. These websites can be run by third parties with separate and independent privacy policies. We, therefore, have no responsibility nor are we liable for any content, activities or privacy policies of these linked sites. We suggest you read the privacy policy of each and every site that you visit.

### Accessing data

If prompted, we will confirm whether or not we are processing your personal data and if so, we will provide you with a copy of that personal data along with any other pertinent details. If you require additional copies, we may need to charge a reasonable fee, but this can be discussed and depends on the situation.

### Restricting the processing of personal data

You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, for example, if you contest the accuracy of the data or object to us processing it. We will notify you before we lift any restriction on processing. If we share your personal data with others, we will notify them of the restriction wherever possible. If prompted, and if it is possible and lawful to do so, we will also notify you with whom we have shared or will share your personal data so you can contact them directly.

### Objections

You may:

- ask us to stop processing your personal data at any time, and we will do so. If we are relying on a legitimate interest to process your personal data, then it should not be a problem unless we demonstrate compelling legitimate grounds for processing;
- object to our processing of your data for the purposes of direct marketing at any time. This can be done by clicking the "unsubscribe" button in our marketing emails; and

- refuse to receive service notifications via email (for example, when a user you are subscribed to publishes a chart, idea, etc.). This can be adjusted in the Settings.

## **Withdrawal of consent**

If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness with which we process your data before receiving notice of your wish to withdraw your consent. We emphasize that we do not generally rely on your consent to allow us to process your personal data if there is another lawful ground available. If we do rely on your consent, we will make this clear to you at that time.

## **Viewing and correcting data**

You have the right to have inaccurate personal data rectified or completed if it is incomplete. In order to do so, each user can view, manage and/or update his/her personal data in the Profile.

If we share your personal data with others, we will notify them of any corrections made whenever possible. If prompted, and where possible and lawful to do so, we will also notify you with whom we have shared your personal data so you can contact them directly if need be.

## **Deleting data**

You have the right to refuse to use our Services and may ask us to delete or remove your personal data in certain circumstances. If we share your data with others, we will notify them of the edits wherever possible. If prompted, and wherever possible and lawful to do so, we will also notify you with whom we have shared your personal data so you can contact them directly if need be.

## **Data retention**

We will keep your personal data (1) until you decide to delete your account (upon request), or (2) as required by law or as necessary for legitimate business purposes (i.e. for tax, legal, accounting, fraud, or abuse prevention, and/or other purposes). This data can be stored even after an account is deleted.

Upon expiration of the applicable retention period, we will securely destroy your personal data in accordance with applicable laws and regulations. In some circumstances we may anonymize your personal data so that it can no longer be associated with you. In this case, such data is no longer considered personal.

If you consent to receive marketing communications, we will keep your data until you unsubscribe, which is possible via the 'unsubscribe' button at the end of our marketing emails. Additional methods to unsubscribe may be added in the future.

## **Data portability**

You have the right to obtain your personal data from us, which that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will give you your personal data in a structured, commonly used, and machine-readable format. You may reuse it elsewhere if you so wish.

### **Lodge a complaint with the data protection authority**

If you have concerns about our privacy practices, including the way we handle or have your personal data, you can report it to any competent data protection. If you wish to exercise any of these rights, please contact us. Note that we may need to ask you for further information to verify your identity before we can respond to any request.

## **Contact information**

If you have any questions or suggestions regarding personal data processing, please contact us via email or post at:

Decode Global Limited

Lolam house, Kumul Highway

Port Vila Vanuatu

[enquiries@decode-group.com](mailto:enquiries@decode-group.com)