



# Privacy Policy

## 隐私政策

29 April 2022

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## I. Introduction

### 引言

1. Easy Trading LCA Ltd (registration number 141412106) is a leading international provider of financial derivatives and related services. Dedicated to providing one-stop financial services for introduction service brokers, financial institutions, and banking institutions around the world.

Easy Trading LCA Ltd (注册编号141412106) 是一家领先的国际金融衍生品及相关服务供应商。竭诚为世界各地的介绍服务经纪商、金融以及银行机构提供一站式的金融服务。

## II. Scope of the Privacy Policy

### 隐私政策范围

The scope of this Privacy Policy is to provide you (or data subject) with information of how Easy Trading LCA Ltd collects and uses information through its website. This Privacy policy does not apply to websites operated by other organizations and other third parties. By registering with, or accessing the Easy Trading LCA Ltd website, you consent to the collection, use and processing of your personal data.

本隐私政策范围（或数据主体）向你方提供有关 Easy Trading LCA Ltd 通过其站点，收集和使用信息的方法。本隐私政策不适用于其他组织和第三方经营的网站。登录或访问 Easy Trading LCA Ltd 网站，表示允许收集、使用和处理你方个人信息。

## III. Commitment

### 承诺

Easy Trading LCA Ltd respects the privacy of any user that accesses its website(s). We are therefore committed in taking all reasonable steps in safeguarding the personal data of any existing or prospective clients, applicants, and visitors.

Easy Trading LCA Ltd 将对访问其网站的用户进行隐私保密。因此，我方将采取一切合理措施，为任何现有或潜在客户、申请人和访客的个人信息提供保护。

## IV. Information we collect

### 我方收集的信息

Throughout our cooperation we collect information directly from you, through any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website, mobile app, subscribe to our service or any other activities carried out on our website or any connected applications. The information we collect may include but are not limited to your first and last name, email, country and city of residence, phone number, social media profile details, IP address, nationality, tax identification number, date of birth, residential address, bank details, financial situation, employment status, trading activity, transaction history, account balance information ("Personal data"). We are also required by law to collect certain Know Your Client ("KYC") documentation in order to verify your identity. KYC documents may include but are not limited to:

在合作期间，我方通过电话和电子邮件等方式，直接收集你方信息，包括你方注册使用我方网站、移动 app、订购服务或通过我方网站或任何应用程序，开展任何其它活动的信息。我方收集的信息包括但不限于你方姓名、电子邮件、国家和城市、电话号码、社交媒体信息、IP 地址、国籍、税标识号、出生日期、居住地址、银行信息、财务状况、就业状况、交易活动、交易历史、账户余额（“个人信息”）。依照法律规定，我方也会收集某类“认识你的客户”（“KYC”）文件，从而对你方身份进行验证。KYC 文件包括但不限于：

#### i. Proof of identity (e.g. ID/Passport, driving license)

身份证明（例如：ID/护照和驾照）；

- ii. Proof of address (e.g. Utility bill, driving license)  
地址证明（例如：公用事业费账单和驾照）；
- iii. Proof of credit card statement (e.g. Bank Statement)  
信用卡账单证明（例如：银行对照单）；

We may also collect indirect information from you, which we use purely for verification, security or purely for browsing/ functionality purposes. Such information may include your (IP) address, browser type, operating system, Internet service provider (ISP), cookies.

我方也会间接收集仅限于验证、安全或浏览/功能性的信息。该类信息包括你方（IP）地址、浏览器类型、操作系统、互联网服务提供商（ISP）和信息记录程序。

## **V. Purpose for which we will collect your personal data**

收集个人信息的目的

We collect, use, disclose, store, and process your personal data for the performance of our services as required by law. We use your personal data to provide you with the services you request through our Website and Trading Platform so as to perform our contractual obligations related to those services.

为了依照法律规定开展服务，我方需要收集、使用、披露、保存和处理你方的个人信息。我方通过网站和交易平台，使用你方的个人资料，以为你方提供要求的服务，从而履行与该类服务有关的合同义务。

We also collect your personal data for internal purposes including the improvement of customer experience, promotional and marketing services (e.g. emails, social media, SMS), customer care, training purposes and administration matters. Such data is safely stored via physical or electronic means and procedural controls, and it is treated CONFIDENTIAL. We only collect personal data that is adequate and relevant for the purposes of our business and for a reasonable period as required by law. We never ask for more information that is required by law.

我方的个人信息用于内部目的，包括改进用户体验、宣传和营销服务（例如：电子邮件、社交媒体和 SMS）、用户关怀、培训目的和管理事务。通过物理或电子方式以及程序控制，对该类资料进行安全保存，并对其进行保密处理。我方仅在法律规定的合理期限内，收集与业务有关的个人信息。我方不会获取法律规定以外的更多信息。

## **VI. Our legal obligations**

我方的法律义务

We may be required to retain and use personal data to meet our legal requirements, for data security purposes and as we believe to be necessary or appropriate in order to: (a) comply with our obligations under applicable law and regulations, (b) respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, (c) monitor compliance with and enforce our Trading Platform terms and conditions; (d) carry out anti- money laundering, sanctions or KYC checks as required by applicable laws and regulations; or (e) protect our rights, privacy, safety, property, or those of other persons. 出于数据安全目的，及我方认为有必要或适用应对下列情况时，我方会留存和使用个人信息：（a）履行适用法律和条例下的义务；（b）回应法院、执法机关、监管机构以及其它公共和政府当局的质询；（c）监督我方平台条款的履行情况；（d）根据适用法律和条例规定，开展反洗钱、制裁或 KYC 核查；或（e）保护我方或他人的权利、隐私、安全和财产。

We may also be required to use and retain personal data after you have closed your Easy Trading LCA Ltd account for legal, regulatory and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud prevention.

当你方因法律、监管和合规原因，比如：防止、侦测或调查犯罪；损失预防；或防欺诈，关闭 Easy Trading LCA Ltd账户时，我

方也会使用和留存个人信息。

## **VII. Disclosure of your Personal Data**

### **个人信息披露**

We disclose and/or share your personal data when necessary to provide our services or conduct our business operations. When we share personal data, we do so in accordance with applicable data privacy laws and our internal security standards. We do not sell personal data or client database we collect. We do not distribute or transfer any data of our clients to any unauthorized or non-affiliated to it, third parties.

在提供服务或开展经营活动时，如有必要，我方会披露和/或共享你方个人信息。当我方共享个人信息时，我方会依照适用的数据保密法律及内部安全标准执行。我方不会售卖收集的个人信息或客户数据库。同时，我方也不会将客户的任何数据分发或转让给任何未经授权或无关联的第三方。

Below are the parties with whom we may disclose and/or share personal data:

以下是我方披露和/或共享个人信息的各方：

- i. Within Easy Trading LCA Ltd group of Companies: Easy Trading LCA Ltd 集团内的公司：

The Company is part of the Easy Trading LCA Ltd group of Companies (“Easy Trading LCA Ltd”). In order to meet our contractual obligations to you, the Company is supported by Easy Trading LCA Ltd group employees and contractors. For the provision of services, we may make personal data available to them if necessary. All our employees and contractors are required to follow our data privacy and security policies when handling personal data.

公司属于 Easy Trading LCA Ltd 公司集团（“Easy Trading LCA Ltd 集团”）的一部分。为了履行我方与你方的合同义务。公司需要获得 Easy Trading LCA Ltd 集团员工和承包方的支持。在提供服务时，如必要，我方会向其提供个人信息。当处理个人信息时，所有员工和承包方均应符合我方的信息保密与安全政策要求。

- ii. 安全政策要求。

Our third-party providers:  
第三方提供商：

The Company is supported by third party providers/service providers. We may disclose data to our service providers that we do business with if necessary. In those cases, we retain confidentiality agreements, and any data we may disclose is always on a “need to know” basis, and solely for the provision of our services to you. Such services may include cooperation with financial institutions, such as banks and payments processing providers, promotional functions, direct marketing services, software system and platform support, cloud hosting services, advertising (including affiliate advertising), data analytics.

公司由第三方提供商/服务提供商支持。必要时，我方会向服务提供商提供信息。在此情况下，我方会留存保密协议，并基于“必须了解”，披露信息。在此，仅限于向你方提供的服务。该类服务包括与金融机构的合作，比如：银行和支付流程提供方、宣传部门、直复营销服务、软件系统和平台支持、云主机服务、广告（包括关联方广告）和数据分析。

- iii. Regulatory disclosure:  
监管披露：

We will also share and/or disclose personal data if we believe it is required, to third parties for legal reasons in order to comply with legal obligations, including but not limited to law enforcement and other public authorities.

在我方认为需要时，也会共享和/或披露个人信息给第三方，以履行相关法律义务，包括但不限于法律执行和其它公共权限。

iv. **Affiliate Marketing:**  
关联营销：

We have an affiliate marketing program called “Easy Trading LCA Ltd Partners” which is a commercial arrangement whereby third parties promote Easy Trading LCA Ltd and its products and services in return for a fee. We do not share your personal data with these third parties.

我方拥有一个名为“Easy Trading LCA Ltd 合伙人”的关联营销项目，其作为一种商业安排，由第三方为 Easy Trading LCA Ltd 及其产品进行宣传，并获得相应的服务费。我方不会与该类第三方共享你方个人信息。

**VIII. Data Security**

数据安全

Your security and data protection are of utmost importance to us. All information you provide to us is stored on our secure servers, where it is protected by our comprehensive, modern, and well-maintained data security infrastructure. We protect your information by using data security technology that includes, but is not limited to such systems as firewalls, encryption, access controls; physical security; physical and logical network separation; technology audit tools; and appropriately administered and monitored internal roles and procedures.

我方将你方的数据安全防护摆在最重要位置。你方向我方提供的全部信息被保存在我方安全服务器内，通过我方现代化的数据安全基础设施，获得全面和完善的保护。在为你方的信息提供防护时，我方采用下列数据安全技术，包括但不限于该类系统，比如：防火墙、加密、存取控制；物理保密；物理和逻辑网络分隔；技术审核工具；及适当管理与监控的内部任务和程序。

Unfortunately, the transmission of information via the Internet is not completely secure. We will take all steps reasonably necessary to ensure that your personal data is kept secure and protected in accordance with our legal obligations and standards. If this is not possible, for example because we are required by law to disclose data, we will ensure that the sharing of the data is lawful.

然而，通过互联网传输信息，无法完全确保安全性。在此，我方将采取一切合理必要的措施，并依照我方法律义务和标准，为你方的数据提供安全保障。如根据法律要求，我方必须披露信息，则将确保信息共享的合法性。

**IX. Cookies**

信息记录程序

Cookies are small text files that are sent to and stored on your device, such as desktop and laptop, smartphone, tablet/phablet, for accessing the internet, when you visit a website or a page. Cookies allow a website to recognize a user's device. The objective of cookies use is to improve and make the user's experience easier. By using you agree to our use of cookies to enhance your experience.

当你方进入互联网，访问网站或网页时，信息记录程序是发送和保存到你方设备上的小型文本文件。你方的设备包括台式电脑、智能手机、平板/平板手机。信息记录程序可以让网站识别用户的设备。信息记录程序旨在帮助提升用户体验。当你方同意我方使用信息记录程序时，可帮助提升你方的使用体验。

## **X. Marketing**

### **营销**

We may collect personal Information through social media sites when you interact with us on one of our social channels, via our Apps or/and from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are connected on social media platforms, as well as from other third parties.

当你方通过我方的 Apps 和/或其它资源，与我方的某一社交渠道，比如：公共数据库；联合营销合伙人；社交媒体平台，进行互动时，我方可以通过社交媒体，从你方在社交媒体平台上的联系人，以及其他第三方处，收集个人信息。

We may send you information by SMS, push notification, email, in-app notification or contact you by telephone or by any other means to provide you with information about our products, services, training and offers we think would be of interest to you. If you receive email communications from us about the market or your activity on the Trading Platform and don't want to in the future, you may opt out by clicking the unsubscribe link situated at the end of each email sent to you or by notifying the member of staff that contacted you and we will stop sending you this information. If you have any further questions, please do not hesitate to contact us by email.

我方可通过 SMS、推送通知、电子邮件、app 内的通告、电话或任何其它方式，向你方提供有关我方产品、服务、培训以及我方认为你方可能感兴趣的信息。如你方通过电子邮件收到有关市场或你方在平台上活动的信息，并希望以后不再接收该类信息，你方可以点击位于电子邮件结尾处的不再订阅链接，或通知你方的联系人，选择不参加。随后，我方将停止向你方发送该信息。如你方有任何其它问题，请随时通过电子邮件：[support@easytradingol.com](mailto:support@easytradingol.com)、[accounts@easytradingol.com](mailto:accounts@easytradingol.com)，与我方联系。

## **XI. Changes to Privacy Policy**

### **隐私政策变更**

Any changes we may make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail and/or when you next start the App or log onto the Site. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services. Please note that we reserve the right to amend, revise, modify and/or change our Privacy Policy at any time.

未来，我方对隐私政策的变更，会在网站上发布。如适合，会通过电子邮件和/或在你方下次开启 App 或登录站点时，向你方发出通知。届时，会在屏幕上显示新条款内容，要求你方阅读并接受，以便继续使用 App 或服务。请注意我方有权随时修正、修订、修改和/或变更我方的隐私政策。

## **XII. Social Media and Promotions**

### **社交媒体和宣传**

We may collect personal Information through social media sites when you interact with us on one of our social channels, via our Apps or/and from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are connected on social media platforms, as well as from other third parties.

当你方通过我方的 Apps 和/或其它资源，与我方的某一社交渠道，比如：公共数据库；联合营销合伙人；社交媒体平台，进行互动时，我方可以通过社交媒体，从你方在社交媒体平台上的联系人，以及其他第三方处，收集个人信息。

**XIII. Our Communication with You**

## 我方与你方的沟通方式

You can contact us at any time with questions or concerns. We will notify you separately (probably, with a pop-up notice) if we process your personal data for any other purpose and, if required, ask for your consent. You can control what and how you receive communications from us and how we use your information. 如你方有任何问题或关注，请随时与我方联系。如我方需要将你方的个人信息用于任何其它目的，会单独向你方发出通知（可能是弹出通知），以寻求你方的许可。你方可以对沟通方式和信息使用方式进行控制。

You are entitled to request a copy of your personal data that we hold. You may also modify your personal data at any time. If you have any questions, please do not hesitate to contact us by email. 你方有权获得我方持有的你方个人信息的副本。同时，也可随时修改你方的个人信息。如你方有任何疑问，请随时通过电子邮件 [support@easytradingol.com](mailto:support@easytradingol.com)，与我方联系。