

## **TRADEXPAD PRIVACY NOTICE**

### **1. Introduction**

At tradeXpad, we take privacy seriously. We are committed to the protection of personal data in line with the data protection principles set out in the European General Data Protection Regulation (“**GDPR**”).

This Notice describes the steps tradeXpad, (“**tradeXpad**“, “**we**” or “**us**”) take to protect the personal data that we process about our EU customers and other EU business partners.

“**tradeXpad Group**” means the group of companies (including tradeXpad) directly, or indirectly, held and/ or controlled by tradeXpad Asia Limited, a company with its principal place of business at 2003, 20/F, Tower 5, China Hong Kong City, 33 Canton Road, TsimShaTsui, Kowloon, Hong Kong.

“**tradeXpad Website**” means the tradeXpad website: [www.tradexpad.com](http://www.tradexpad.com).

“**European Economic Area**” or “**EEA**” means the Member States of the European Union, plus Norway, Iceland and Lichtenstein.

### **2. Who is responsible for processing your data and how to contact us**

tradeXpad B.V., with its registered address business at Strauslaan 9, 3723JN Bilthoven, the Netherlands, registered with the Trade Register of the Dutch Chambers of Commerce under No. 74310429 is responsible for processing your personal data and is the data controller. tradeXpad can be contacted at the following email address: [contact@tradexpad.com](mailto:contact@tradexpad.com).

### **3. What personal data do we collect and why?**

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting the personal data of our business contacts.

#### **A - Sources of personal data**

We may obtain your personal data from the following sources:

- a) from you directly (for example, at the time of subscribing to any services offered on our website(s), including but not limited to email mailing lists, interactive services, posting material or requesting further goods or services);
- b) from your device or browser; and/or
- c) if you contact us, we may keep a record of that correspondence.

**B - Personal data that we collect and process**

- a) name;
- b) email address;
- c) company;
- d) address;
- e) phone number;
- f) cookie data (for more information please see our Cookie Notice as available on our tradeXpad Website: [www.tradexpad.com](http://www.tradexpad.com)); and
- g) IP address.

**C - Why do we collect your personal data and what is our lawful basis for it?**

<b>Website Visitors</b>		
<b><i>We may use your personal data to:</i></b>	<b><i>Our lawful basis for doing so is:</i></b>	<b><i>Our legitimate interests in doing so are:</i></b>
Provide our website services to you	Legitimate Interest	Website management Promote our goods and services Account management
Establish and manage our business relationship		Understand the market in which we operate Management reporting (including at an intra-group level) Account management
Learn about our websites(s) users' browsing patterns and the performance of our website(s)		Website management
Use the data in Artificial Intelligence		To determine trends within the industry sector country
Security		Managing security, risk and crime prevention Management reporting (including at an intra-group level)

Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our goods and services Management reporting (including at an intra-group level)
Learn about how our products or services may be used		Understand the market in which we operate Management reporting (including at an intra-group level)

Where we use cookies or similar technologies to fulfill this purpose we will seek your prior consent where required doing so by law.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

#### 4. Who do we share your personal data with?

We share personal data relating to our clients and business contacts with trusted third party vendors and business partners. The purposes for these transfers are set out below. We do not sell your personal data to third parties.

We may share your personal data with other entities in the tradeXpad Group.

We may disclose information about you to organizations that provide a service to us, on the understanding that they will keep the information confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- a) technical support providers who assist with our website and IT infrastructure;
- b) third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
- c) professional advisers such as lawyers, accountants, tax advisors, auditors and insurance brokers;
- d) providers that help us generate and collate reviews in relation to our goods and services;
- e) our advertising and promotional agencies and consultants and those organizations selected by us to carry out marketing campaigns on our behalf; and/or
- f) providers that help us store, collate and organize information effectively and securely, both electronically and in hard copy format, and for marketing purposes.

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business.

## 5. Transfers of personal data outside the European Union (EU) / European Economic Area (EEA)

If and when transferring your personal data outside the EU/EEA, we will do so using one of the following safeguards:

- a) the transfer is to a non-EU/EEA country which has an adequacy decision by the EU Commission;
- b) the transfer is covered by a contractual agreement, which covers the GDPR requirements relating to transfers to countries outside the EU/EEA;
- c) the transfer is to an organization which has Binding Corporate Rules approved by an EU data protection authority; or
- d) the transfer is to an organization in the US that is EU-US Privacy Shield certified.

International transfers within the tradeXpad Group are governed by EU Commission-approved Standard Contractual Clauses for Controllers (as defined under the GDPR) and, where relevant, for Processors (as defined under the GDPR).

We may also transfer your data to third-party vendors outside the EU/ EEA, such as our customer relationship management systems providers. Where we do so, the Standard Contractual Clauses or other safeguards approved by the European Commission will be put in place to safeguard that personal data.

You may request a copy of these agreements by contacting [contact@tradexpad.com](mailto:contact@tradexpad.com).

## 6. Your rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request personal data provided by you to be transferred in machine-readable format (“data portability”).** This enables you to ask us to provide you, in a machine-readable format, personal data that you have provided to us for transfer to another data controller.
- **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).

- **Object to the processing of your personal data in certain circumstances.** This right may apply where the processing of your personal data is based on the legitimate interests of Company, as explained above, or where decisions about you are based solely on automated processing, including profiling.
- **Withdraw your consent.** You may withdraw your consent in those circumstances where we may rely on your consent to process your personal data.

These rights are not absolute and are subject to various conditions under the laws and regulations to which we are subject.

If you have any general queries or decide at any time that you would like to exercise any of your rights as set out above, please contact [contact@tradexpad.com](mailto:contact@tradexpad.com).

#### 7. **Retention period**

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defense of legal claims.

#### 8. **Changes**

We may make changes to this Notice from time to time to reflect changes in the law or in our practices. Such changes will be applicable as of the effective date set out in this Notice.

Version 18 November 2019.