

PRIVACY POLICY

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Introduction

1. INTRODUCTION

At Jin Daocheng Limited) (hereinafter “we”, “us” or “our” or the “Company”) we are committed to protect our clients’ privacy and handling their personal data in an open and transparent manner.

The purpose of this Privacy Policy (hereafter the "Policy") is to provide a clear explanation of when, why and how we collect and use personal data. We have designed it to be as user friendly as possible, and have separate it in sections to make it easy for you to find the information that is most relevant to you. We reserve the right to modify this Policy at our sole discretion, whenever we deem fit or appropriate, so please review this section frequently.

The new European Union (EU) Data Protection Law, the General Data Protection Regulation (GDPR), comes into effect on 25th of May 2018. The GDPR (EU) 2016/679 gives individuals in the EU more control over how their data is used and places certain obligations on businesses that process the information of those individuals. We have updated our Privacy Policy to reflect the new requirements of the GDPR.

2. WHO WE ARE

Jin Daocheng Limited is an Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the License No 316/16. The head office of the Company is located at 6, Kallinikou street, Limassol, 3117, Cyprus.

By opening a trading account or request a service from JDC MARKETS we will require you to provide us with information about you. We will need to use the information in certain ways – from basic needs like verifying your identity to more complex things like determining whether financial trading is appropriate for you and processing your requests and transactions. The client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

3. COLLECTING PERSONAL DATA

Being the regulated investment company, we collect and process different types of personal data required by Anti-Money Laundering Law, the Cyprus Investment Services and Activities regulated Markets Law and other legislative requirements for the following purposes:

To establish business relationship with the Company including account opening, proper execution of trading and non-trading transactions.

We may also collect and process personal data which we lawfully obtain not only from our clients but also from third parties e.g. online screening tools such as World Check Compliance or any other. In relation to the Client's transactions we are recording the telephone calls in line with laws and regulations that we are subject to. In more limited circumstances, we also may collect images and video data via security cameras located at the entrance for security purposes in order to reduce the risk arising from unauthorised access, theft etc. For this purpose, we have placed signs in our premises in all prominent places that are clearly visible and readable and convey appropriate information including our details, the purpose for using security cameras .

4. THE TYPE OF PERSONAL DATA WE COLLECT ARE THE FOLLOWING

In relation to potential, historic and current clients we collect the following personal data:

CATEGORY	PERSONAL DATA
COMMUNICATION	<ul style="list-style-type: none"> • E-mail • Phone • Address • Skype
APPLICATION FOR ACCOUNT OPENING	<ul style="list-style-type: none"> • Name • Gender • Birth date • Occupation
	<ul style="list-style-type: none"> • PEPs (whether you hold/held a prominent public function) • Social Security Number • Employment status (employed/self-employ) • Tax registration (FATCA/CRS) • Assets and Income • Source of funds • Trading experience • Authentication data (e.g. signature)
VERIFICATION OF IDENTITY	<ul style="list-style-type: none"> • Passport / National ID / Driver's License / Images through security cameras
BUSINESS RELATIONSHIP	<ul style="list-style-type: none"> • Results of appropriateness and suitability test • AML risk profile • Banking details • Account balance • Trading activity • Record of your inquiries and our responses

5. THE COLLECTION OF PERSONAL DATA, CONFIDENTIALITY, RECORDING OF TELEPHONE CALLS AND RECORDS

The Company may collect client information directly from the Client (in his completed Account Opening Application Form or otherwise) or from other persons including, for example, credit reference agencies, fraud prevention agencies and the providers of public registers.

The client acknowledges that when providing his personal information to the Company to open an account with the Company, the Company will use, store, process and handle personal information provided by the Client (in case of a natural person) in connection with the provision of the Services, in accordance to the General Data Protection Regulation (EU 2016/679) or any other similar applicable legislation.

The Client further consents when the Company is transferring his personal information outside the European Economic Area where this is necessary for the Company to fulfill its contractual obligations to him. The Client agrees and consents to the processing of his personal information in accordance with this Agreement and the Company's Privacy Policy as published in its website and as updated from time to time.

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy Policy.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

The client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, for research and statistical purposes and for marketing purposes (if the Client's consent is obtained where he is a natural person) and for any other reason to comply with our legal, regulatory and contractual obligations. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Client acknowledges that the Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

- a) Where required by law or a competent Court;
- b) Where requested by CySEC or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients;
- c) To relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- d) To execution venues or any third party as necessary to carry out Client Instructions or Orders and for purposes ancillary to the provision of the Services;
- e) To credit reference and fraud prevention agencies, third authentication service providers and other financial institutions for credit reference agencies, fraud prevention agencies, third authentication service providers and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained;
- f) To the Company's professional advisers provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- g) To other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use

Client information or get in touch with the Client or improve the provision of the Services under this Agreement;

- h) To data reporting service providers;
- i) To other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form;
- j) To market research call centers that provide telephone or email surveys with the purpose to improve the services of the Company;
- k) Where necessary in order for the Company to defend or exercise its legal rights;
- l) At the Client's request or with the Client's consent;
- m) To an Affiliate of the Company.

To administer and improve the www.jdcmarkets.com web site, the Company may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

7. INFORMATION COLLECTED FROM YOUR VISIT TO OUR WEBSITE

When you visit our website or trade on our platforms, we may automatically collect and store information concerning you. This helps JDC MARKETS to provide you with a good experience when you browse our websites and/or trade with us, and it also allows us to improve our websites.

In general, we collect:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- The Company uses cookies to secure clients' trading activities and to enhance the performance of the www.jdcmarkets.com web site. Cookies used by the Company do not contain personal information or other sensitive information.

8. WHY DOES JDC MARKETS USE YOUR PERSONAL INFORMATION?

The Company uses clients' personal information only as required to provide quality service and security to its clients. The purpose for collecting your information is for the following:

- to review your eligibility to do business with us and to verify your identity and background before we agree to do business with you;
 - to carry out our obligations arising from any services we offer you and or contracts you enter with us;
 - to comply and cooperate with regulators, governmental authorities and the courts and to comply with our legal obligations;
 - to process any requests, enquiries or complaints received from you;
 - to notify you about changes to our service as a courtesy or where necessary;
 - to administer our site and services and for internal business operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site and services;
 - as part of our efforts to keep our site and trading systems safe and secure; and
 - to provide you with information about goods and services we offer that are similar to those that you have already purchased or enquired about or that may be of interest to you. We will not sell your personal data to third parties.
- ✓ If a client does not want to receive information regarding services and promotions for any reason, they can contact the Company at the following address:**support@jdcmarkets.com**

9. PAYMENTS

If you use our Services for purchases or financial transactions (like when you fund your account, withdraw money from your account or purchase an app or development services)’’in accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption – TLS 1.2 and application layer with algorithm AES and key length 256 bit’’. In addition to that JDC MARKETS does not store nor collect credit card details. All credit card information is stored by the payment provider.

10. Non-affiliated third parties and Data Protection

All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

11. Contact Clients

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

12. RESTRICTION OF RESPONSIBILITY

The Company is not responsible for the privacy policies or the content of sites to which www.jdcmarkets.com links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a cobranded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

13. DATA PROTECTION RIGHTS

Subject to the provisions of the GDPR, you have certain rights regarding the Personal Data we collect, process or disclose and that is related to you, including the right:

- To receive access to your personal data (right to access).
- To rectify inaccurate personal data concerning you (right to data rectification);
- to request deletion/ erasure of your personal data (right to erasure/deletion, “right to be forgotten”)

14. PRIVACY POLICY UPDATES

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients’ personal information, the revised Privacy Policy will be uploaded in the Company’s website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company’s Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.