



# Privacy Policy

June 2025

## Important information

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In accordance with Article 24 GDPR (EU) 2016/679, taking into account the nature, scope, context and purposes of processing, as well as the risks to the rights and freedoms of natural persons, Tickmill Europe Ltd has implemented appropriate technical and organisational measures to ensure compliance with the [General Data Protection Regulation \(GDPR\)](#) as amended from time to time.

This Policy provides to data subjects, information on who we are, how and why we collect personal data, the types of data collected, how data is used, when and with whom it may be shared and how data is stored safely. It also provides information on data subjects' rights in relation to their personal data being processed by us and on how to contact us and the supervisory authority in the event of a complaint.

This policy has been drafted in compliance with the requirements of the GDPR which applies across the European Union.

## Who are we?

Tickmill Europe Ltd, a company registered in the Republic of Cyprus and whose registered office is Kedron 9, Mesa Geitonia, Limassol, Cyprus, P.C. 4004 ("Tickmill", "us", "our" or "we").

We are registered and regulated by the Data Protection Commissioner of the Republic of Cyprus. We act as a controller for the purposes of processing your personal data.

Third country clients are subject to the same rights under this Privacy Policy.

## Personal information collected to provide our services

In the process and following your registration as a client for a demo or live account with us and/or filling any other form on our Website, subscribing to our services, news or offers, marketing communications or posting material or contacting us via our communication methods, the following information about you ("Your Data") will be collected and stored for business, educational, service related, and/or legal purposes.

We limit the collection of personal data to what is necessary to administer our business and carry out our regulated activities in an effort to provide you with superior service.

Information that you provide to us directly:

- Personal information such as: names, addresses, personal registration number, national identification number, passport number, e-mail addresses etc ("Personal Information"), and
- Financial information such as: trading experience, employment information for appropriateness assessment (not personal data per se as this data do not identify any individual).

However, the meaning of data is not limited to the above. It is also personal data resulting from observation of your activities (e.g. where using a device or service).

This may include:

- Communications between you and Tickmill via Live Chat, email, or telephone call.
- History of website usage or search activities, details of your visits to our website;
- traffic and location data;
- website traffic pattern information, including IP addresses, operating system and browser type, for system administration and to report aggregate information to our advertisers. This information is only used in masked or aggregated form, which means that the individual user is not identifiable.

Your e-mail address may be used by Tickmill in relation to its products and services (including any marketing campaigns related to those products or services). If you do not wish to receive marketing material and/or marketing communications, you can opt-out any time by clicking on our email 'unsubscribe' option or by sending an email request to [support@tickmill.eu](mailto:support@tickmill.eu).

## The type of data collected and purpose of collection

The type of data we collect along with the purpose of collection are listed below:

### Personal data type:

### Purpose:

Personal information such as gender, name, date of birth and address. Also, bank account numbers and any other information required for payment processing.

To meet our anti money laundering (AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence. To verify your identity using our verification processes.

Contact information (email address and phone number).

In order to send you correspondence in relation to the services provided and to fulfil our regulatory and compliance obligations.

Employment information, financial information, relevant education and trading experience.

In order to comply with KYC obligations and in order to meet our regulatory obligations relating to assessing the appropriateness of our products and services for each client.

Ethnicity, citizenship and social security number(s) or national identity and passport number(s). Proof of photo ID, address verification.

In order to comply with KYC and regulatory trade reporting and other AML obligations.

Unique device number (IP address) and device information including version of web browser you use.

When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.

Financial sanctions and credit header information.

In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, criminal convictions or political interests which assists us in drawing conclusions based on the results of these checks.

## How we use your personal information

- To contact you for the provision of our products and services that you requested from us or where you have consented to be contacted for products and services that we feel may be of interest to you;
- managing and administering the products and services provided to you;
- keeping you updated as a client in relation to changes to our services and relevant matters;
- provide, improve, test, and monitor the effectiveness of our service;
- develop and test new products and features;
- monitor metrics such as total number of visitors, traffic, and demographic patterns;
- diagnose or fix technology problems;
- to carry out our obligations arising from any contracts entered between you and us;
- we may use your data or permit selected third parties and our processors to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by email;
- we may also use your data, or permit selected third parties and our processors to use your data for business development services;
- to notify you about our website's updates;
- to send out newsletters or information about other opportunities that we believe will be of interest to you; only if you have provided your consent. You can opt-out from receiving marketing communications at any time by clicking on our email 'unsubscribe' option or by sending an email request to [support@tickmill.eu](mailto:support@tickmill.eu);
- to promote safety and security. We use the information to verify accounts and activity and to promote safety and security on our regulated services, such as, by investigating suspicious activity or violations of our terms and conditions or policies. We work hard to protect your account using teams of IT specialists, automated systems, and advanced technology such as encryption.

## Call recording

All telephone calls inbound and outbound are recorded. The recordings are stored on secure systems and accessed if required for: business purposes, monitoring of employees, to investigate or resolve complaints or for any legal obligation that Tickmill is required to adhere to. We engage service providers who abide to applicable data protection legislation for the operation of our telephone systems.

We may be permitted or required to disclose a call recording (including personal data) without your explicit consent (under applicable legislation) if Tickmill has a legal obligation to do so. The legal basis for processing your personal data, retention periods and your rights in relation to your information can be found in this Policy.

## **With whom we share your personal information**

We do not disclose personal information to third parties without your consent unless specified in this Policy.

We also impose strict restrictions on how our processors can use and disclose the data we provide. We disclose only what is necessary to third parties to perform their contractual obligations with us. Here are the types of third parties we share information with:

- **Service providers and other partners:** We transfer information to service providers (processors), and other partners who globally support our business, such as providing technical infrastructure services, trading platforms analysing how our Services are used such as measuring the effectiveness of ads and services, providing client service and support, client on-boarding, client identity verification, including PEPs and sanctions, conducting marketing communications and design, services related to our website management, services related to software and business development services.

We may need to transfer personal data to recipients/service providers outside the European Union for various reasons. These can include dealings with foreign public entities (only when necessary and under request), for the outsourcing of services to external providers and/or processing the data outside the EU (e.g. cloud computing, client identity verification and individuals from outside the EEA accessing our web-services), or when arranging staff work trips to non-EU countries (see paragraph Transfer of your information out of the EEA).

- **Measurement and Analytics Services:** Partners who use our analytics services like Google Analytics (Non-Personally Identifiable Information Only). We do not share information that personally identify you (personally identifiable information is information like name or email address that can by itself be used to contact you or identify who you are) with advertising, measurement or analytics partners.

Partners like Microsoft Clarity and Microsoft Advertising who capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

Tickmill performs extensive due diligence before choosing processors. Our processors provide sufficient guarantees that they implement appropriate technical and organisational measures in such a manner that processing will meet GDPR requirements and ensure the protection of the data subjects' rights.

The adherence of our processor(s) to approved code(s) of conduct in addition to our Agreement/Contract and/or approved certification mechanism(s) are used as elements to demonstrate compliance with our obligations as the controller.

We ensure that any contract signed between us and our processors is binding as per applicable legislation. The contracts will be setting out the subject-matter and duration of the processing, the nature and purposes of the processing, the type of personal data and categories of data subjects and the risk to the rights and freedoms of the data subjects. Contracts will also include the specific tasks and responsibilities of the processor in the context of the processing to be carried out.

After the completion of the processing, the processor(s) should, at the choice of the controller, return or delete the personal data, unless there is a requirement to store the personal data under Union or Member State law to which the processor is subject.

The data sharing with our processor(s) enables us to proceed, for instance, with our regulated activities and duties (i.e KYC) in order to meet our regulatory obligations. Some of those third-party recipients (processors) may be based outside the EU/European Economic Area ("EEA"); if the third-party recipient is located outside the EU/EEA in a country not ensuring an adequate level of data protection, the transfer can only be completed if a transfer agreement has been entered into between Tickmill and the third party. The transfer agreement shall be based on the EU Standard Contractual Clauses. — for further information including on how we safeguard your personal data when these cases occur, see paragraph 'Transfer of your information out of the EEA'.

We may be required or permitted, under applicable legislation, to disclose personal data without your explicit consent, for example, if we have a legal obligation to do so, i.e for court proceedings, investigation of complaints, criminal sanctions etc.

## **Cookie Data**

We use cookies and similar technologies to provide and support our services. We will use cookies to distinguish you from other users of our website.

For more information about cookies and how we use them, please read our Cookies Policy.

## **How our global services operate**

### **Transfer of your information out of the EEA**

Information collected within the EEA may, for example, be transferred to countries outside of the EEA for the purposes described in this Policy. Tickmill complies with all the general data protection principles and the GDPR as a whole, including the principles relating to international data transfers.

Tickmill may engage in international data transfers only when satisfied that there is an adequate level of data protection. Adequacy assessments may be carried out by Tickmill when transferring data outside the EEA to conduct its regulated activities and services.

Adequate safeguards may be put in place in a number of ways including using Standard Contractual Clauses, Binding Corporate Rules, Binding Corporate Rules for Processors (BCRs), if applicable, or other contractual arrangements. Where “adequate safeguards” are established, the rights of data subjects continue to be protected even after their data has been transferred outside the EEA for processing.

A data transfer can only be completed with a transfer agreement between Tickmill and the third-party if the latter recipient is located outside the EU/EEA in a country not ensuring an adequate level of data protection. The transfer agreement shall be based on the above protections as applicable.

### **How we respond to legal requests or prevent harm**

We access, store and share your information with regulators, law enforcement parties/agencies or others by request:

- We may need to respond to legal, regulatory or judicial requests and/or court orders.
- We may need to detect, prevent and address fraud, unauthorised use of our services or products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or products), you or others, including part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-parties about the reliability of your account in order to prevent fraud, abuse and other harmful activity on and off our products.

Information we receive about you (including financial transactions, deposits and withdrawals) can be processed and stored for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigation of possible violations of our terms or policies,



or otherwise to prevent harm.

## Your rights

Under the [GDPR](#) you have a number of important rights. In summary, those include rights to:

- Fair processing of information and transparency over how we use your personal information.
- The right to access your personal data.
- The right to request that personal data is corrected or updated if found to be inaccurate or out of date.
- The right to request that your personal data is erased where it is no longer necessary. We might not be able to comply with your request for legal reasons (if any) which will be communicated to you.
- Right to data portability: you have the right to receive your personal information in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party (another controller) in certain situations.
- The right to withdraw consent to processing at any time, where relevant.
- The right to object at any time to the processing of your personal information for direct marketing purposes.
- The right not to be subject to a decision which is based solely on automated processing, including profiling, which may have legal effects or significantly affect you.
- The right to object in certain circumstances our continued processing of your personal information.
- Restrict the processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the Office of the Commissioner for Personal Data Protection](#).

If you would like to exercise any of your rights, please:

- send us an email, call or write to us at [support@tickmill.eu](mailto:support@tickmill.eu) or contact our Data Protection Officer at [dpo@tickmill.eu](mailto:dpo@tickmill.eu),
- provide adequate identification information (i.e. account number, user-name, registration details),
- provide proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and

- let us know the information to which your request relates, including any account or reference numbers (if available).

If you would like to unsubscribe from any emails or any marketing communications, you can also click on the

'unsubscribe' button at the bottom of the email communication or by sending an email to [support@tickmill.eu](mailto:support@tickmill.eu).

## **Legal basis for processing personal data**

Reasons we can collect and use your personal information:

### **Lawful basis for processing**

Under GDPR, there must be a lawful basis for all processing of personal data. We rely on:

- Contractual performance

Processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to the entry into a contract to engage in regulated activities.

- Compliance with legal obligations

Tickmill (as a controller) has to comply with legal obligations.

- Legitimate interest

Data will only be processed where necessary for the purposes of the legitimate interests pursued by Tickmill, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require protection. For instance, it is a legitimate interest of Tickmill to process personal data of potential client(s) in order to expand the business and develop new business relations. Tickmill will provide information to data subjects on the relevant legitimate interest if processing is based on this provision.

In any other case, we will require your consent to process your personal information. Such consent must be given freely and can be withdrawn at any time. We might use your personal information for marketing communications. You can opt-out from such communications at any time by clicking on 'unsubscribe' or by sending an email to [support@tickmill.eu](mailto:support@tickmill.eu).

## **Keeping your personal information secure**

We store your personal data in secure computer storage facilities. We have appropriate security measures in place to keep them confidential, prevent accidental loss, misuse, modification, disclosure or unauthorized access.

We limit access to personal information to those who have a genuine business need to know. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach. We will notify you and the regulator of any suspected data security breach if we are legally required to do so.

## **Data Retention Period**

We store your personal information for a period of at least five years after the end of the business relationship to comply with our record keeping obligations under applicable Anti Money Laundering Laws as amended from time to time.

We are required to delete all personal data at the end of that period unless we have to store the data for a prolonged period of time based on any applicable legal requirement or if the data subject has expressly consented to their data being held for an extended period of time.

## **What happens if there is a change of control**

If there is a change of control/ownership at Tickmill (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your personal information may be transferred accordingly. You will not lose access to your account(s) or the right to claim any of your rights under this Privacy Policy. The new controllers will be required to abide to the requirements of this Privacy Policy.

## **How to complain or resolve your queries**

### **How to contact us:**

We hope that our Customer Support or our Data Protection Officer can resolve any query or concern you raise about your personal information.

If you have any questions or complaints, you can contact our Customer Support Team at [support@tickmill.eu](mailto:support@tickmill.eu) or our Data Protection Officer at [dpo@tickmill.eu](mailto:dpo@tickmill.eu).

The data controller responsible for your information is Tickmill Europe Ltd, which you can contact online, by email, by post or telephone call.

Address: Kedron 9, Mesa Geitonia, Limassol 4004, Cyprus

Tel: +357 25041710

You can lodge a complaint with the Cyprus Data Protection Commissioner which is the supervisory authority for the protection of personal information in the Republic of Cyprus if you are not satisfied with our response to your complaint.

Contact Details:

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

Tel.: +35722818456.

Address: 1, Iasonos Str. 2nd Floor, 1082 Nicosia, Cyprus

P.O. BOX 23378, 1682 Nicosia

## **National requirements**

Tickmill complies with the GDPR and European and national data protection legislation. We shall obey national legislation if a higher level of protection of personal information is required. We ensure that our policies/ procedures are in accordance to applicable legislation and are complied with at all times.

## **Changes to this Privacy Policy**

This Privacy Policy was published and last updated in August 2024. We shall inform you via email or via our official website for any changes to this Privacy Policy.

## **Do you need extra help?**

If you would like to receive this Privacy Policy in another format, please contact us (see 'How to Contact Us' above).