PRIVACY POLICY

Effective Date: 12 May 2026

Legal Notice / Imprint

Trade Finance Partners
is a trading name of:

TF Partners Ltd
Company Number: 16188114
Incorporated in England and Wales.

Registered Office:
County House
Third Floor
14/15 Hatton Garden
London
England
EC1N 8AT

Data Protection Registration:
Trade Finance Partners is registered as a Data Controller with the Information Commissioner's Office (ICO).
ICO Registration Number: ZC029474

Disclaimer:
All services, transactions, and activities are subject to applicable laws, regulatory requirements, internal review procedures, and approval where applicable.

§ 1 Controller & Scope

The controller responsible for the processing of personal data within the meaning of the General Data Protection Regulation (GDPR) and applicable data protection laws is:

Trade Finance Partners (a trading name of TF Partners Ltd)
County House, Third Floor, 14/15 Hatton Garden, London, England EC1N 8AT

This Privacy Policy applies to the use of the investment website and all related services, including account administration, investment transactions, and communication with customers and prospective clients.

We process personal data exclusively in accordance with applicable data protection legislation.

§ 2 Definitions

Personal Data: Any information relating to an identified or identifiable natural person.
Processing: Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
Consent: Any freely given, informed, and unambiguous indication of wishes.

§ 3 Purposes of Data Processing

Contract Performance and Pre-Contractual Measures:
• Registration and identity verification (KYC)
• Administration of investment accounts
• Processing deposits and withdrawals
• Execution of investment transactions
• Customer communication

Compliance with Legal Obligations:
• Regulatory reporting obligations
• Tax compliance obligations
• Anti-money laundering requirements
• Record-keeping obligations

Legitimate Interests:
• Fraud prevention
• Risk management and credit assessment
• Business monitoring and service improvement
• Direct marketing where permitted
• Website improvement and analytics

Based on Consent:
• Newsletters and marketing communications
• Surveys and satisfaction analysis
• Profiling for tailored offers

§ 4 Data We Collect

4.1 Access Data (Log Files)
• IP address
• Date and time of access
• Referrer URL
• Browser type and version
• Operating system
• Pages visited and duration

4.2 Account and Contract Data
• Name, date of birth, place of birth
• Address, email address, telephone number
• Identification documents and tax identification number
• Bank details, wallet addresses, source-of-funds information
• Username and encrypted password

4.3 Publicly Available Data
Publicly available information may be processed for investment assessment and risk evaluation purposes where necessary.

§ 5 Legal Bases

• Contract performance – Article 6(1)(b) GDPR
• Legal obligations – Article 6(1)(c) GDPR
• Legitimate interests – Article 6(1)(f) GDPR
• Consent – Article 6(1)(a) GDPR

§ 6 Cookies & Tracking Technologies

The website uses cookies to ensure functionality and enable statistical analysis.

Technically necessary cookies are processed based on legitimate interests.

Analytics and marketing cookies are only used with prior consent.

Users may adjust cookie settings at any time.

§ 7 Recipients of Data

Personal data may be disclosed:
• With consent
• For contract performance
• Where legally required
• To protect legitimate interests

Recipients may include payment providers, hosting providers, IT service providers, regulators, tax authorities, credit agencies, and marketing providers where consent has been granted.

Data is not sold or rented to third parties.

§ 8 International Transfers

Personal data may be transferred only where:
• An adequacy decision exists;
• Appropriate safeguards are implemented; or
• Explicit consent has been provided.

§ 9 Retention Period

Data is retained only as long as necessary and in accordance with legal retention obligations.

§ 10 Data Subject Rights

Individuals have the right to:
• Access personal data
• Rectify inaccurate data
• Erase data
• Restrict processing
• Data portability
• Object to processing
• Withdraw consent
• Lodge a complaint with a supervisory authority

§ 11 Automated Decision-Making & Profiling

No automated decisions producing legal effects are made unless specifically notified.

Profiling may be used for creditworthiness assessments, investment interests, and service optimization where legally permitted.

§ 12 Data Security

Appropriate technical and organizational measures are implemented to protect customer data, assets, and transactions, including:

• SSL/TLS encryption for all data transmissions

• Multi-factor authentication (2FA) for account access

• Secure escrow wallet infrastructure for client fund protection

• Segregation of client assets from company funds

• Role-based access controls and authorization management

• Regular security audits and vulnerability assessments

• Continuous system monitoring and fraud detection mechanisms

• Data encryption at rest and in transit

• Secure backup and disaster recovery procedures

• Anti-money laundering (AML) and Know Your Customer (KYC) controls

• Protection against unauthorized access, cyberattacks, and data breaches

• Employee confidentiality obligations and regular security training

• Periodic penetration testing by independent security specialists

§ 13 Newsletter & Marketing

Newsletter subscriptions operate through a double opt-in process.

Consent may be withdrawn at any time using the unsubscribe link or by contacting us.

§ 14 Changes to this Privacy Policy

This Privacy Policy may be amended to reflect legal, technical, or operational changes.

§ 15 Contact & Data Protection Officer

Trade Finance Partners
TF Partners Ltd
County House, Third Floor
14/15 Hatton Garden
London EC1N 8AT
England

§ 16 Final Provisions

This Privacy Policy is designed to comply with GDPR requirements and to provide transparent information regarding the processing of personal data.