

Privacy Policy

I. General Information

1. We at Dropmeister Limited (“We”, “Company”, “Us” or “Our”), are committed to securing your (“You”, “Your” or “User”) Personal Data (as defined below) and Your privacy. As part of this commitment, it is important for Us to be transparent about how We handle the information that We collect about Our Users, when We collect information about them, and how We use such information.
2. This privacy policy (the “Policy”) provides information regarding the use of data that the Company collects about the Users of the <https://1cft.com/> website (the "Website") and the various services offered by the Company over any of its related products and services (collectively, the “Services”). By accessing and using the Website or the Services, please be acknowledged that as a User of this Website you have read, understood, and agree to be bound by the terms of this Policy.
3. This Policy is part of and should be read in conjunction with the Terms and Conditions available at: https://1cft.com/wp-content/uploads/2024/11/2024-10-03-GENERAL-Terms-of-Conditions_platform-prop-trading.pdf.
4. In this Policy, any reference to “Personal Data” is to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or in combination with additional information that Company has or that Company has access to.

II. When does Company collect Personal Data about Website Users?

The Company may collect Personal Data about Users in the following circumstances:

- When User accesses or uses the Website.
- When User uses the Services.
- When User interacts with the Company in any manner, including by sending the Company messages through third party messaging applications or in any other manner; and when User submits Personal Data in the appropriate section dedicated for contact.

III. What types of Personal Data does Company collect?

The Company may collect the following types of Personal Data about Users:

1. Upon creation of an account with Company, User provides to the Company with certain information that can be used to identify User including full name, Email address and country of

residence, as well as any other information as the Company may deem necessary to collect at the point of registration. While some of the details mentioned above are required fields in the pages of registration. The Company to these fields that are not compulsory recommends that User completes them so that Company can provide User with the best quality of services.

2. When User is taking part in simulated trading, the Company collects all information regarding User's trading program, purchase price, payment method for receiving funds and follow User's trading behaviour and monitor it for Company analytical purposes, building trading strategies, evaluation Users as well as to fraud prevention.

3. KYC AML information

The Company may require User to provide any other third party which acts on behalf of Company with an additional information for the purpose of compliance with Know-Your-Customer ("KYC") and Anti-Money Laundering applicable legal requirements and best practices.

4. Communication information

When User contacts Company, through any channel whatsoever, including the "Contact us" section, when User subscribes to Newsletter on the Website or social media networks, he/she may provide Company with User's full name, Email address, and the content of User's communication.

5. Website or Services usage information

This information includes online activity log, traffic information (including, without limitation, IP address, time of access, date of access, web and mobile page(s) visited, language used, crash reports and type of browser used, and information regarding the device User have used.

6. Website or Services activity information

Whenever User uses the Website, the Company monitors use of the Website by the User and record his/her activity. The information that the Company gathers about Users in this context includes any activity that he/she may perform on the Website or Services, please be advised that the Company may receive User's trading data from the Services, the length of time the User will be watching content on the Website, User's interaction with content in the Website, etc.

7. Aggregate Information

The Company will also create statistical, aggregated and anonymized data relating to Users and the Service for analytical purposes, including business development and Services improvements. The Company will share this aggregate information with any Company's third-party partners. Aggregated data is derived from personal information and user data but in its aggregated form it does not relate to or identify any client or individual or any specific user's data. This data is used to understand Company's customer base and to develop or/and improve Services.

IV. The Purposes of The Processing of Personal Data

1. The Company processes User's Personal Data for one or more purposes outlined in this section and according to the appropriate legal basis.
2. The Company will not process Personal Data about User unless there is a legal basis for such processing.
3. The legal bases according to which the Company may process Personal Data about User are as follows:
 - Legitimate Interests
Processing is necessary for the purposes of provision of the Services, or any other legitimate interests pursued by the Company or by a third party.
 - Consent
Website User's consent that the Company will process Personal Data about User for one or more specific purposes. For example, for the purpose of sending marketing materials to the User.

V. How the Company is using Personal Data

The Company may use Personal Data about User for the following purposes:

- a. To operate the Website and provide the Services;
- b. to contact User for the purpose of operational purposes;
- c. to personalize content and offers for User;
- d. to respond to User queries, requests and/or complaints;
- e. to send User materials regarding the Services, events and other information Company thinks will be of interest to User;
- f. to analyse and improve the Services, as well as to develop and offer new ones;
- g. to analyse and track usage to determine the usefulness or popularity of certain content and to better understand the online activity of the Website Users;
- h. to perform and maintain various activities supporting the offering and provision of the Services, including, but not limited to, the Services (such activities include back-office functions, business development activities, strategic decision making etc.);
- i. to protect Company and third parties' interests, rights and assets, including detecting, investigating and preventing fraudulent transactions or unauthorized or illegal activities and initiation or exercise or defence of legal claims and preventing them;
- j. To perform KYC checks;
- k. to fulfil Company's legal or regulatory requirements.

VI. Sharing of Personal Data with Third Parties

1. Monitoring and Compliance

The Company employs various monitoring tools and techniques to ensure the security, integrity, and compliance of the Services, inter alia, in order to ensure compliance with applicable laws, regulations, and internal policies, including rules referring to trading. The Company may share relevant information with regulatory authorities or law enforcement agencies as required or permitted by law.

2. The Company may transfer Personal Data according to the following:

- to entities that control the Company, entities that are under Company's control and/or to entities under common control or ownership with Company, as shall be from time to time (collectively, the "Group"). Such entities may use the Personal Data to support the needs of the Group;
- upon User's consent or instruction;
- to fulfil Company's legal or regulatory requirements or to comply with a national authority request or a court order;

3. The Company may also share Personal Data about User with third parties that provide Company with the following services:

- Storage and hosting providers, including cloud computing services and data security services; IP address information;
- analysis of user experience;
- support services;
- marketing services;
- CRM data management;
- KYC services providers;
- third -party services and integrations; accounting and legal services;
- research, analytical, technical, and diagnostic services.

4. The Company will share aggregate information with Company's third-party partners, in its aggregated form, which does not relate to or identify any particular User.

VII. Retention

The Company will retain Personal Data about User only for as long as necessary for the fulfilment of the purposes for which such Personal Data is collected. The Company may retain Personal Data about User for longer periods if find it necessary to comply with applicable legal requirements.

VIII. Cookies and Trackers

1. The Company may use certain third-party services, such as analytics companies or other companies delivering advertisements, which may also use cookies or other technologies, and those practices and providers are subject to their own policies.
2. For more information regarding the use of cookies in our Website please see our Cookie Policy available at: https://1cft.com/wp-content/uploads/2024/11/2024-10-03-Cookie_Notice_prop-trading.pdf.

IX. Security

The Company have implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Data under Company's control from unauthorized access, improper use or disclosure, unauthorized modification, or unlawful destruction.

X. Links to Other Websites

1. The Website may contain links to third-party websites and applications. Likewise, other websites and applications may also reference or link to the website. The Company does not control these third-party websites and applications, nor the collection and processing of Personal Data by these entities. This Policy does not apply to any actions taken via such websites and applications.
2. Whenever User accesses such third-party websites and applications, it is recommended that User carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data.

XI. Rights in respect of the Personal Data

1. User has the right to request to be provided by the Company with confirmation as to whether Personal Data about User is being collected by the Company, to ask to review such data, to rectify the content if applicable and to erase the Personal Data no longer required. User may also restrict his/hers consent to certain processing of Personal Data.
2. Where the consent is the legal basis for the processing of the User's Personal Data, he/she may at any time withdraw the consent for the purposes for which he/she provided the consent by sending a notice free of charge to the following email address: privacyteam@1cft.com.
3. If User withdraw the consent for the processing of Personal Data, the Company might not be able to provide User with some or all of the Services he/she requested or in the form intended to be provided to User. The User is not entitled to make any claim in respect of that.

4. At any time, User may approach the Company by sending a notice to the email address privacyteam@lcft.com in order to receive information concerning the Company's review.
5. The Company may provide with offers that are tailored specifically for the User. This may include ads, offers and other sponsored content related to Company's products and services or of third parties.
6. User may withdraw consent from receiving marketing materials via email at any time, by sending an email free of charge with the title "unsubscribe" to the following email address: privacyteam@lcft.com or by clicking the unsubscribe option in any marketing material.
7. Please note that User decides to opt out of receiving marketing communications the Company may still communicate with the User in purpose of providing non-marketing information about Company's services or for other legitimate non-marketing reasons.
8. User is entitled to the following rights in respect of the Personal Data. To exercise these rights, she/she may send a request to privacyteam@lcft.com.

XII. Transfer of Personal Data

1. Personal Data may be transferred to a third country. In such circumstances, the Company shall take appropriate safeguards to ensure the protection of Personal Data and to provide that enforceable data subject rights and effective legal remedies for data subjects are available.
2. If User is an EEA resident, please note that these safeguards and protection will be available if any of the following are met:
 - The transfer is to a third country or an international organization that the EU Commission has decided provides an adequate level of protection to the Personal Data that is transferred to it pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR");
 - The transfer is according to a legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR;
 - The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR.

The User may request to be provided with details concerning the safeguards employed by it to protect the Personal Data and also that are transferred to a third country, by sending an email to the following address: privacyteam@lcft.com.

XIII. Changes to the Policy

The Company may amend the terms of this Policy. Whenever the Policy is amended, the Company will notify about such amendments by publishing the updated Policy on the Website. All amendments will enter into force upon publication of the updated Policy on Website or the designated page on the Website.

XIV. Contact Us

For any queries relating to this Policy and data protection, please send e-mail on: privacyteam@lcf.com.