

TRA STRA – Privacy Policy

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Introduction

This Privacy Policy governs privacy of the Users (you, your) of the <https://trastra.com> Website (“Website”) and app served and operated by us, Trastra Limited (“we”, “us”, “our”) and describes what personal data (“Data”) is collected and how it is used, processed, stored and managed by us, under the applicable legislation, while you use our Website and Services (“Services”).

We are a company duly registered in England and Wales under company number 10966907, with registered office at 1 Kings Avenue, London, United Kingdom, N21 3NA.

Before getting aware of this Privacy Policy, we advise you to carefully read our [User Agreement](#), [Cookies Policy](#), [AML Policy](#), in order to get comprehensive insight into the terms and rules referred to our Website and Services use.

If you use our Services, this means that you have read all the mentioned terms and rules. By consenting to use our Services, you expressly agree with this Privacy Policy and expressly consent to and agree with your Data processing as stipulated herein.

General Provisions

This Privacy Policy shall be governed by, construed, interpreted, and enforced in accordance with the laws of the United Kingdom. This Agreement provisions may be not applicable exclusively in case where the applicable and governing law prevails or supersedes. If any provision of this Privacy Policy is, or is found to be, inapplicable or unenforceable under the law, that will not affect the applicability or enforceability of the other provisions of this Privacy Policy.

We reserve the right to alter, vary and revise this Privacy Policy, whenever lawfully required or in view of marketing, commercial, technological, whatever upgrade or as we deem necessary, with considering the applicable law. Such revised or updated versions shall apply from

the date of publication, unless otherwise expressly stated. By using our Website and any such revised or updated versions, you agree with and accept the terms of this Privacy Policy regarding the updates.

Where you have provided us with your consent to use, store or disclose your Data, you have the right to withdraw such consent at any time by emailing us at info@trastra.com. We will cease using your Data, unless we are required to do so by law. Please, note that after that you may not access certain facilities or features provided to you based on or subject to your Data. Please read Data Management and Restriction of Processing clauses herein for details.

Under the applicable law, you have the right to receive information about the Data that we have collected about you, upon your request.

You represent and confirm to provide us with only true and accurate information.

This Privacy Policy envisages the use of cookies (“Cookies”), explained herein below and in more detail according to our [Cookies Policy](#).

For reference on your rights under the UK data protection laws, you may proceed to the [UK Information Commissioner’s Office](#) website.

Data Collection

We may collect and process your personal Data, as follows:

- Your e-mail address, first name and last name, date of birth, resident address, postal address, contact phone number;
- Identity documents, occupation, employment industry, financial standing;
- Preferences, interests, favourites;
- Data regarding your payment transactions, transactions activity log, billing, payment details and other financial and settlement details obtained by us when you use our Services, in order to effect and administer your operations;
- Domain and host from which you access the Internet, your computer’s or other usable device’s IP address, web browser type and the operating system software; unique IDs of your devices when you use Android and/or IOS mobile apps;
- The date and time you access our Website or app;
- The address of the website from which you linked to our Website when you visit us;
- We collect your Data during your current and for future Website or app visits and use, as provided below in the Cookies section.

Please, be noted that if you directly disclose your personal Data, or sensitive Data (such as, among others, racial or ethnic origin, political opinions, religious beliefs, physical or mental health, membership in any organisations, etc.), through public features, this information may be collected and used by other persons.

Data Use and Security

We may use your personal Data, as follows:

- To operate our Website or app and deliver our Services properly (which may include disclosure to relevant Third Parties as set forth);
- To provide general statistics regarding use of our Website or app;
- To send you welcome email following registration procedures;
- To send you occasionally our Services updates;
- To contact you for surveys purposes (you do not have to respond to such surveys);
- To maintain accuracy of our records;
- To verify your Data for the purpose of managing our customer relationships and observing the Know Your Client (KYC) rules;

- To comply with legal and regulatory obligations with respect to Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), prevention of criminal activity and lawfully protect our legal interests;
- To keep our Website and app safe and secure.

For the purposes of the applicable law, we are the “Data Controller” of your personal information and we will securely retain any Data submitted by you to us.

Unless we are obliged or permitted by law to do so, and subject to our relevant Third Parties business relationships (our partners, service providers, contractors, agents, financial institutions, social media, without limitation), we will not disclose your Data to any irrelevant Third Parties, for the purpose of security matters.

The Data security is highly important to us and to protect your Data we will organize and take all the necessary and appropriate measures and technologies to safeguard and secure your Data collected through this Website.

To use all features and functions of our Website, you may be required to submit certain Data, including password(s). You are responsible for keeping your password(s) confidential and safe.

While we seek to do our utmost to protect your Data, you need to keep in mind that transmission of any information over the Internet is not entirely secured and is implemented at your own risk and discretion. We, therefore, cannot ensure the security of your Data transmission to our Website or app, whenever that is beyond our reasonable control.

You undertake to notify us immediately of any unauthorized access or use of your account or any other breach of security by e-mail: info@trastra.com

Data Portability

You may request a snapshot of your personal Data in computer readable form to be delivered to you or a third party you designate by emailing us at info@trastra.com.

Data Management

You may amend or remove any portion of your personal Data at any time by using Website interface, app or contacting or emailing us at support@trastra.com. Such amendment or removal of certain Data may lead to limiting or cessation of your access to Services.

Please note that we are legally obligated to save all previous instances of your Data in accordance to Restriction of Processing clause as set below.

Restriction of Processing

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations require us to store your personal Data for at least five (5) years. Upon amendment or removal of your Data, it is archived and safekept separately from processed Data (i.e. Restriction of Processing rules apply). Such restricted Data is stored without processing and cannot be accessed automatically or by unauthorised personnel. Restricted data may only be used or restored only in select ways prescribed by law or legal proceeding. Upon expiry of storage term, restricted Data is deleted.

Cookies

Our Website and app uses Cookies (“Cookies”), small text files saved to your computer or device in order to customize and improve your experience while visiting and using our Website or app, according to our [Cookies Policy](#). Our Website and app uses a Cookies choice reservation

allowing you to accept/enable or refuse/disable the use and saving of our Cookies on your computer or other usable device.

The Third Parties

We use or may use facilities of other relevant Third Parties (our partners, service providers, contractors, agents, financial institutions, social media, without limitation), in order to provide our Services and deal with certain processes necessary for the operation of the Website. In that regard, such relevant Third Parties will have access to respective personal Data provided by you.

On our Website and app we include or may include the references or links to the Third Parties websites. External links may be clickable texts, banners, image links to other websites, without limitation. We do not control outbound Websites, nor take responsibility for their content, terms of service or any policies. This Privacy Policy governs only specifically this Website and does not extend to your use of other websites, even those of our partners and Service providers, social media, etc. We, therefore, advise you to review the privacy policy for other websites prior to using them.

We may transfer our rights and obligations under this Privacy Policy, where we reasonably believe your rights will not be affected. You may not transfer any of your rights and obligations under this Privacy Policy to any other person or otherwise deal with your rights and obligations under this Privacy Policy.

Social Media

We may have official profiles in social media networks. We advise you to verify authenticity of such profiles before using them. We will never ask for your passwords or personal details in social media networks. When using the social media buttons, you do so at your own risk and discretion.

Downloads

Any downloadable documents, files or media made available on and through our Website or app are provided to you at your own risk. While we stick to any measures regarding genuine downloads, we, however, advise you to verify the downloads authenticity, including by antivirus programs. We accept no responsibility for downloads of the Third Parties websites, external websites.

Email and Marketing Messages

Where we informed you and where you agreed, we may use your Data to send you notifications about our Services, various profile news, updates regarding our activities by virtue of email newsletters mailing. Email mailings and marketing messages may contain technologies to track your activities. You may subscribe or unsubscribe of such mailing, contacting us by our e-mail or through details provided in that message.

Contact Us

Should you have any questions regarding this Privacy Policy, please contact us at: info@trastra.com