

# PRIVACY POLICY

*GDPR Compliant*

## THE JAZZ FINTECH (BROKTRADING LTD)

*A Cyprus Limited Liability Company*

Registration Number: HE 342927

*Last Updated: 19/01/2026 | Version 2.0 (MoR Edition)*

## 1. Introduction

### Who we are and why this policy matters

At **BROKTRADING LTD** ("Company", "we", "us", "our"), a private limited liability company incorporated under the laws of the Republic of Cyprus, with registered office at Orfeos Street 18B, 1070 Nicosia, Cyprus, and registration number HE 342927, operating under the trading name **THE JAZZ FINTECH**, protecting your privacy is our absolute priority, and this privacy policy aims to explain clearly and transparently how we collect, use, store, and protect your personal data when you visit our website, use our products, or access our services.

This policy has been drafted in compliance with the General Data Protection Regulation (GDPR), Cyprus Law 125(I)/2018, and all other applicable data protection regulations.

### The Data Controller

The data controller for your personal data is **THE JAZZ FINTECH (BROKTRADING LTD)**. If you have any questions about privacy or wish to exercise your rights, you can contact us at [compliance@thejazzfintech.com](mailto:compliance@thejazzfintech.com).

### An important note about the Merchant of Record

**Please note:** when you make a purchase through our channels, our Merchant of Record (MoR), namely Paddle. Paddle means:

- where the Buyer is purchasing the Product from within the United States, Paddle.com Inc whose registered office address is at 3811 Ditmars Blvd, 1071, Astoria, NY 11105-1803, USA; and
- otherwise, for sales of the Product made in the rest of the world: Paddle.com Market Limited whose registered office address is at Judd House, 18-29 Mora Street, London, EC1V 8BT, UK

The MoR independently collects and processes certain personal data necessary to process your payment. In this context, the MoR acts as an independent data controller for payment data. This privacy policy covers only the data that we process directly; for data processed by the MoR, please refer to their privacy policy available at <https://www.paddle.com/legal/privacy>.

### Who this policy applies to

This privacy policy applies to various categories of individuals we interact with: visitors to our website, those who create an account with us, our customers, users of our

software, recipients of our marketing communications, and more generally, anyone whose data is processed as part of our activities.

## 2. The data we collect

### Categories of personal data

In the course of our business, we collect various types of personal data. **Identity data** includes your name, the username you choose, your date of birth, and, when necessary, identity documents. We also collect your **contact data**, such as your email address, postal address, and telephone number.

When you create an account, we store your **account data**: your username, password (always encrypted for your security), and your preferences. Through your use of our services, we automatically collect certain **technical data**, including your IP address, browser and device type, and your time zone.

**Usage data** helps us understand how you interact with our services, while **profile data** includes your interests, expressed preferences, and feedback you provide. Finally, we maintain **marketing data**, which consists of your preferences regarding the communications you wish to receive from us.

### Data we receive from the Merchant of Record

When you complete a purchase, we receive from the MoR only the information strictly necessary to fulfil your order. This includes confirmation of successful payment, order details (which products you purchased and the type of licence), basic information to deliver your licence (name and email), and transaction reference numbers.

It is important for you to know that **we never receive** your full payment card details, banking information, or detailed billing data: this information remains exclusively with the MoR.

### How we collect your data

Your data reaches us through various channels. **Direct interactions** occur when you register, make a purchase, fill out a form, or contact us. We also use **automated technologies** such as cookies and tracking pixels that collect certain data during your browsing. As already explained, we receive some information from the **Merchant of Record** when they process transactions. Finally, we may receive data from **third parties**, such as analytics services or public sources.

### Special categories of data

We do not intentionally collect sensitive personal data, such as data relating to racial or ethnic origin, religious beliefs, health status, or biometric data.

### 3. Legal bases for processing

The GDPR requires that every processing of personal data be based on a valid legal basis. Here are the bases on which we rely to process your data.

When processing is necessary for the **performance of a contract** with you (Art. 6(1)(b) GDPR), we use it to create and manage your account, deliver products, activate licences, and provide support.

In some cases, we rely on our **legitimate interests** (Art. 6(1)(f)), always balancing them against your rights and freedoms. This occurs, for example, when we improve our services, ensure security, prevent fraud, analyse usage of our products, or send marketing communications to existing customers.

For certain activities, we ask for your **explicit consent** (Art. 6(1)(a)), such as sending marketing communications to those who are not yet our customers or for the use of certain cookies.

Finally, some processing is necessary to comply with **legal obligations** (Art. 6(1)(c)), such as tax and accounting requirements, regulatory compliance, or responses to requests from authorities.

### 4. How we use your data

#### To provide our services

We use your data to create and manage your account, to deliver licences and access keys for our products, to provide support when you need it, to communicate important information about your account, and more generally, to manage our relationship with you effectively.

#### To improve our products

The data we collect also helps us analyse how our services are used, improve existing products, develop new features, conduct research, and personalise your experience to better suit your needs.

#### For marketing activities

When we have your consent or when we can rely on our legitimate interest, we may send you newsletters, inform you about new products and features, offer you targeted advertising, or ask you to participate in surveys. Remember that you can always choose to stop receiving these communications: you will find an unsubscribe link at the bottom of every email we send.

## To ensure security

Your data also helps us protect our services, detect and prevent fraudulent activity, verify user identity when necessary, and investigate any suspicious activity.

## 5. Who we share your data with

### Recipients of your data

In certain cases, we may share your data with third parties. Our **service providers** (such as those providing hosting, email services, or data analytics) receive the data necessary to perform their functions, always subject to contractual obligations that ensure the protection of your data.

As already explained, we share certain information with the **Merchant of Record** to process orders and deliver licences. We may also share data with **business partners** such as affiliates or resellers, with our **professional advisors** (lawyers, accountants), and, when required by law, with the **competent authorities**. In the event of mergers, acquisitions, or other corporate transactions, your data may be transferred as part of such **business operations**.

### Sharing with the Merchant of Record

It is important to understand how data sharing with the MoR works. When you make a purchase, you provide certain data directly to the MoR. The MoR then communicates to us the transaction confirmation and basic details necessary to fulfil your order. For our part, we share your email address with the MoR so they can send you receipts and invoices. Regarding payment data, the MoR acts as an independent controller: if you have questions or requests relating to this data, you will need to contact the MoR directly.

### International transfers

Your data may be transferred outside the European Economic Area (EEA). In these cases, we always implement appropriate safeguards to protect your data, such as European Commission adequacy decisions, Standard Contractual Clauses, or, in some cases, your explicit consent.

### We do not sell your data

We want to be clear on one fundamental point: **we do not sell your personal data to third parties**, ever.

## 6. How long we keep your data

We retain your data only for as long as necessary for the purposes for which we collected it. Your account data is kept for the duration of your account and for 7 years following its closure. Transaction records are retained for 7 years, as required by tax

and legal obligations. Marketing data is kept until you withdraw your consent. Technical and usage data is retained for 2 years, while communications with our support team are kept for 5 years.

After these periods, your data is deleted or anonymised. Regarding payment data retained by the MoR, please refer to their retention policies.

## 7. Your rights under the GDPR

### What your rights are

The GDPR grants you a number of important rights over your personal data. You have the **right of access** (Art. 15), which allows you to obtain confirmation of the processing of your data and receive a copy. With the **right to rectification** (Art. 16), you can request the correction of inaccurate data concerning you.

The **right to erasure** (Art. 17), also known as the "right to be forgotten", allows you to request the deletion of your data in certain circumstances. With the **right to restriction** (Art. 18), you can request that the processing of your data be limited in certain specific cases.

The **right to data portability** (Art. 20) allows you to receive your data in a structured, commonly used format, so you can potentially transfer it to another controller. You also have the **right to object** (Art. 21) to processing based on legitimate interest or carried out for marketing purposes.

The **right relating to automated decisions** (Art. 22) protects you from being subject to decisions based solely on automated processing that produce significant effects. Finally, you always have the **right to withdraw consent** (Art. 7) at any time, without affecting the lawfulness of processing carried out before the withdrawal.

### How to exercise your rights

To exercise any of these rights, you can contact us at:

[compliance@thejazzfintech.com](mailto:compliance@thejazzfintech.com).

We will respond to your request within one month, with the possibility of an extension of a further two months for particularly complex requests. We may ask you to verify your identity before proceeding. Exercising your rights is free of charge, except in cases of manifestly unfounded or excessive requests.

### For data held by the Merchant of Record

If you wish to exercise your rights in relation to payment and billing data held by the Merchant of Record, you will need to contact the MoR directly following the instructions in their privacy policy.

### The right to complain

If you believe that the processing of your data violates applicable regulations, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection in Cyprus or the supervisory authority in your country of residence.

## **8. How we protect your data**

The security of your data is our priority. We have implemented numerous technical and organisational measures to protect your information. We use encryption both during data transmission and when data is stored in our systems. Our data is held in secure data centres, protected by firewalls and intrusion detection systems.

We regularly conduct security testing and have implemented rigorous access controls. Our staff receive specific training on data protection, and we have established procedures to respond promptly to any security incidents. We also perform regular backups to ensure the availability of your data.

Regarding payment processing, the MoR implements its own security measures, including compliance with the PCI-DSS standard for handling payment card data.

In the unfortunate event of a data breach that could compromise your rights, we will notify the competent supervisory authority within 72 hours and inform you without undue delay if the breach poses a high risk to your rights and freedoms.

## **9. Cookies**

Our website uses cookies, as described in our dedicated Cookie Policy. Before installing non-essential cookies on your device, we always request your consent.

## **10. Services not intended for children**

Our services are not intended for persons under the age of 18, and we do not knowingly collect personal data from minors. If you are a parent or guardian and believe that a minor has provided us with their personal data, please contact us immediately so that we can take the necessary steps.

## **11. Links to third-party websites**

Our services may contain links to third-party websites, including that of the Merchant of Record. We are not responsible for the privacy practices adopted by these websites. We encourage you to read their privacy policies carefully before providing them with your personal data.

## **12. Changes to this policy**

We may update this privacy policy from time to time. In the event of material changes, we will notify you by email or by posting a notice on our website at least 30 days before

the changes take effect. Your continued use of our services after that date will constitute acceptance of the new policy.

## 13. How to contact us

### For privacy matters handled by us:

THE JAZZ FINTECH (BROKTRADING LTD)

Registered Address: Orfeos Street 18B, 1070 Nicosia, Cyprus, Cyprus

Email: [compliance@thejazzfintech.com](mailto:compliance@thejazzfintech.com)

Websites: [www.thejazzfintech.com](http://www.thejazzfintech.com); [www.pfarmour.com](http://www.pfarmour.com)

Registration Number: HE 342927

### For payment data matters handled by the Merchant of Record *PADDLE*

Website: <https://www.paddle.com/>

Support: <https://www.paddle.com/help>