

GDPR Policy

NeoTraders.io

This GDPR policy supplements other policies of NeoTraders.io (further NeoTraders).

Definitions:

Business purposes – the purposes for which personal data may be used by the Company;

Personal data – information relating to identifiable individuals, such as job applicants, current and former employees, agency, contract and other staff, clients, suppliers and marketing contacts; Data Controller – An organization that determines the way in which personal data is processed. The controller must be able to demonstrate compliance with the principles and ensure contracts with data processors comply with the GDPR.

Data Processor – An organization that processes personal data, but only in accordance with the instructions of the data controller. This can include subcontractors and agents. Processors must maintain records of personal data and processing activities and will have legal liability if responsible for a breach.

Processing – Collecting, disclosing, storing, using or any other operation performed upon personal data. If you use personal data in any way you will be “processing” it.

NeoTraders Data Protection Officers with a Compliance Officer must process personal data fairly and lawfully in accordance with individuals’ rights.

The Data Protection and Compliance Officers’ responsibilities:

- Keeping the board updated about data protection responsibilities, risks and issues;
- Reviewing all data protection procedures and policies on a regular basis;
- Arranging data protection training and advice for all staff members and those included in this policy;
- Answering questions on data protection from staff, board members and other stakeholders;
- Responding to individuals such as clients and employees who wish to know which data is being held on them by the Company.

Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose.

Personal data

Client must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the Data Protection or Compliance Officer so that they can update your records.

Data security

You must keep personal data secure against loss or misuse. Where other organisations process personal data as a service on our behalf, the DPO will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third party organisations.

Storing data securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it;
- Printed data should be shredded when it is no longer needed;
- Data stored on a computer should be protected by strong passwords that are changed regularly;
- We do not store data on memory sticks or other portable devices;
- Servers containing personal data must be kept in a secure location;
- Data should never be saved directly to mobile devices such as laptops, tablets or smartphones;
- All servers containing sensitive data must be approved and protected by security software and strong firewall.

Data retention

NeoTraders must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, considering the reasons that the personal data was obtained.

Subject access requests

Please note that under the Data Protection Act 1998, individuals are entitled, subject to certain exceptions, to request access to information held about them. If you receive a subject access request, you should refer that request immediately to the DPO. We may ask Client to help Company comply with those requests as well as the Data Controller. Please contact the Data

Protection Officer if you would like to correct or request information that we hold about you. There are also restrictions on the information to which you are entitled under applicable law.

Training

All staff will receive training on this policy. New joiners will receive training as part of the induction process. Further training will be provided at least every two years or whenever there is a substantial change in the law or our policy and procedure. Training is provided in-house with regular updates.

It will cover:

- The law relating to data protection;
- Our data protection and related policies and procedures. Completion of training is compulsory.

Privacy Notice - transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for NeoTraders.

Consent

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time. With reference to the data supplied by our customers to conduct a job, it is our customers responsibility as the data owners to gain active consent.

Criminal record checks

Any criminal record checks are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Data audit and register

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

Consequences of failing to comply

We take compliance with this policy very seriously. Failure to comply puts both you and the organisation at risk. The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in dismissal. If you have any questions or concerns about anything in this policy, do not hesitate to contact the DPO at hello@neotraders.io.