docree.

# Privacy Policy

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| COMPANY | Docree Demo Funding Ltd |
| REGISTRATION | HE 000000 |
| EFFECTIVE DATE | November 28, 2026 |
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SECTION 01

# Introduction

1.1 Docree Demo Funding (hereinafter referred to as "the Company," "we," "us," or "our") is committed to protecting the privacy and personal data of its Participants, prospective Participants, website visitors, and other individuals who interact with our services.

1.2 This Privacy Policy explains what personal data we collect, how we use it, who we share it with, and what rights you have in relation to your data. It applies to all personal data processed by the Company in connection with the provision of our evaluation services, website, client portal, and trading platforms.

1.3 This Privacy Policy has been drafted in accordance with applicable data protection laws and regulations and applicable national data protection legislation. Where local legislation imposes stricter requirements, we comply with such legislation.

1.4 By registering for an account, accessing our website, or using any of our services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with the practices described herein, you should not use our services.

SECTION 02

# Data Controller

2.1 The data controller responsible for processing your personal data is Docree Demo Funding Ltd, a company incorporated in British Virgin Islands with registration number HE 000000, whose registered address is Sample Address, P.O. Box 000, Road Town, Tortola, British Virgin Islands.

2.2 For any questions regarding data protection or this Privacy Policy, you may contact our Data Protection Officer at dpo@docree.com.

SECTION 03

# Data We Collect

3.1 We collect and process the following categories of personal data, depending on the nature of your relationship with us and the services you use:

## 3.2 Personal Identification Data

- Full legal name, date of birth, nationality, and country of residence
- Government-issued identification documents (passport, national identity card, driver's license)
- Proof of address documentation (utility bills, bank statements, official correspondence)
- Photographs and selfie images for identity verification purposes
- Tax identification number (TIN) and tax residency status, where applicable

### 3.3 Financial and Payment Data

- Payment card details (credit/debit card number, expiry date) used to purchase evaluations
- Bank account details provided for profit payouts on funded accounts
- Electronic wallet identifiers and payment processor account information
- Transaction history including evaluation purchases, refunds, and profit payouts
- Source of funds information, where required for verification purposes

### 3.4 Trading Activity Data

- Evaluation account numbers, account types, and evaluation plan details
- Order history, trade execution records, open and closed positions within the evaluation environment
- Profit and loss records, drawdown metrics, and trading day counts
- Instrument preferences, position sizing, and trading patterns
- Platform usage data across MetaTrader 5, cTrader

### 3.5 Device and Technical Data

- IP address, browser type and version, operating system, and device identifiers
- Login timestamps, session duration, and access logs
- Geolocation data derived from IP address
- Referring website URLs and pages visited within our website
- Screen resolution, language preferences, and time zone settings
- Cookie identifiers, session tokens, and similar tracking technologies

SECTION 04

# How We Collect Data

### 4.1 Data Collected Directly from You

4.1.1 We collect personal data directly from you when you register for an account, purchase an evaluation, submit identity and address verification documents, communicate with our support

teams, participate in surveys or promotions, or submit any form on our website.

## 4.2 Data Collected Automatically

4.2.1 When you visit https://docree.com or use our trading platforms, we automatically collect technical data through cookies, server logs, and similar technologies. This includes your IP address, browser type, device information, pages visited, and the date and time of your visits.

4.2.2 When you participate in the evaluation program, we automatically collect and record all trading activity on your evaluation account, including order placement, modification, and closure, as well as account balance and equity snapshots.

## 4.3 Data Obtained from Third Parties

4.3.1 We may receive personal data about you from the following third-party sources:

- KYC and identity verification providers — electronic identity verification services, document authentication providers, and biometric verification partners
- Payment service providers — transaction confirmation data, fraud screening results, and chargeback notifications
- Sanctions screening databases — PEP (Politically Exposed Persons) status and sanctions list checks
- Affiliate and marketing partners — referral information and lead data where you have been introduced to us by a third party
- Public registers and databases — company registries, tax authority databases, and publicly available information

SECTION 05

# Purpose of Processing

5.1 We process your personal data for the following purposes:

| Purpose | Description |
|---|---|
| Account registration and onboarding | To verify your identity, establish your account, and enable you to purchase evaluations and access the trading platform |
| Evaluation service provision | To provide the simulated trading environment, monitor compliance with evaluation rules, assess your trading performance, and determine eligibility for a funded account |

| Purpose | Description |
|---|---|
| Payment processing | To process evaluation fee payments, issue refunds where applicable, and process profit payouts for funded traders |
| Regulatory and legal compliance | To comply with anti-money laundering (AML), know-your-customer (KYC), tax reporting, and other legal obligations applicable to the Company |
| Fraud prevention | To detect, prevent, and investigate fraud, prohibited trading strategies, multi-accounting, identity theft, and abuse of the evaluation environment |
| Communication | To respond to your enquiries, send account notifications, provide evaluation updates, and deliver service-related communications |
| Marketing | To send promotional materials, newsletters, and educational content where you have provided consent or where we have a legitimate interest |
| Platform improvement | To analyse usage patterns, diagnose technical issues, and improve the performance and functionality of our evaluation services and trading platforms |
| Legal proceedings | To establish, exercise, or defend legal claims and to comply with court orders or regulatory investigations |

SECTION 06

# Legal Basis for Processing

6.1 Under applicable data protection laws and regulations, we must have a lawful basis for processing your personal data. We rely on the following legal bases, depending on the specific processing activity:

## 6.2 Performance of a Contract

6.2.1 Processing is necessary for the performance of the Client Agreement between you and the Company, including account registration, provision of the evaluation environment, payment processing, and profit payouts. Without such processing, we would be unable to provide our services to you.

## 6.3 Compliance with Legal Obligations

6.3.1 Processing is necessary to comply with legal and regulatory obligations to which the Company is subject. This includes AML and KYC requirements, tax reporting obligations, transaction record-keeping requirements, and responding to requests from competent authorities, law enforcement agencies, and courts.

## 6.4 Legitimate Interests

6.4.1 Processing is necessary for the purposes of our legitimate interests, provided that such interests are not overridden by your fundamental rights and freedoms. Our legitimate interests include:

- Fraud detection, prevention, and investigation, including detection of prohibited trading strategies and multi-accounting
- Monitoring compliance with evaluation rules and trading parameters
- Business analytics, reporting, and improvement of our services
- Network and information security
- Direct marketing to existing Participants regarding similar products and services
- Enforcement of our legal rights and contractual terms

## 6.5 Consent

6.5.1 Where we rely on your consent as the legal basis for processing (for example, for marketing communications to prospective Participants or the use of non-essential cookies), you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

SECTION 07

# Data Sharing and Disclosure

7.1 We do not sell your personal data to third parties. We may share your personal data with the following categories of recipients where necessary for the purposes set out in this Privacy Policy:

## 7.2 Payment Processors and Banking Partners

7.2.1 We share transaction data, identification data, and payment details with payment service providers, banks, and electronic money institutions in order to process your evaluation fee payments, refunds, and profit payouts. These providers act as independent data controllers or data processors, depending on the nature of the arrangement.

## 7.3 KYC and Verification Providers

7.3.1 We share identification documents and personal information with third-party identity verification providers, electronic KYC services, and document authentication partners in order to verify your identity and comply with our AML obligations.

### 7.4 Authorities and Regulators

7.4.1 We may disclose your personal data to regulatory authorities, tax authorities, law enforcement agencies, and courts where we are required to do so by law or regulation, or where it is necessary to protect the Company's legitimate interests.

### 7.5 Other Third Parties

7.5.1 We may also share your personal data with the following recipients:

- IT service providers — hosting providers, cloud storage services, cybersecurity firms, and software development partners
- Trading platform providers — third-party platform operators who provide the simulated and live trading infrastructure
- Professional advisors — legal counsel, auditors, and accountants acting under obligations of confidentiality
- Affiliate and marketing partners — where you have been referred to us by a third party, limited data may be shared for commission calculation purposes
- Group companies — entities within the same corporate group as the Company, for internal administrative purposes and consolidated reporting

7.6 All third parties with whom we share personal data are required to implement appropriate technical and organisational measures to protect your data. Where third parties act as data processors on our behalf, we enter into data processing agreements that comply with applicable data protection requirements.

SECTION 08

## International Transfers

8.1 Your personal data may be transferred to, and processed in, countries outside the jurisdiction in which you reside. Such transfers may be necessary for the performance of our contract with you, for the provision of our services, or for the fulfilment of our legal obligations.

8.2 Where we transfer personal data to a country that has not been deemed to provide an adequate level of data protection, we ensure that appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) or equivalent contractual protections approved by the relevant authority
- Binding Corporate Rules (BCRs) for intra-group transfers

- Transfers to countries or territories that have been granted an adequacy decision by the relevant authority
- Other legally recognised transfer mechanisms under applicable data protection law

8.3 You may request a copy of the applicable safeguards by contacting our Data Protection Officer at dpo@docree.com.

SECTION 09

# Data Retention

9.1 We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected, to comply with our legal and regulatory obligations, and to protect our legitimate interests.

9.2 The following retention periods apply as a general guide:

| Data Category | Retention Period | Basis |
|---|---|---|
| Participant identification and KYC records | Minimum 5 years after the end of the business relationship | AML/KYC regulatory requirements |
| Transaction and payment records | Minimum 5 years after the date of the transaction | Financial record-keeping obligations |
| Evaluation and trading activity records | Minimum 5 years after the completion or termination of the evaluation | Contractual and dispute resolution purposes |
| Communication records | Minimum 5 years from the date of the communication | Regulatory requirements and dispute resolution |
| Marketing consent records | Duration of the consent plus 3 years | Demonstrating lawful basis for processing |
| Website and platform analytics | Up to 26 months from the date of collection | Legitimate interest in service improvement |

9.3 Where longer retention periods are required by applicable law or regulation, or where data is necessary for the establishment, exercise, or defence of legal claims, we may retain your data beyond the standard periods indicated above.

9.4 Upon expiry of the applicable retention period, your personal data will be securely deleted or anonymised so that it can no longer be associated with you.

SECTION 10

# Your Rights

10.1 Subject to applicable law and certain exemptions, you have the following rights in relation to your personal data:

## 10.2 Right of Access

10.2.1 You have the right to request confirmation of whether we process your personal data and, if so, to obtain a copy of that data together with information about the purposes of processing, categories of data, recipients, retention periods, and your rights.

## 10.3 Right to Rectification

10.3.1 You have the right to request the correction of inaccurate personal data and the completion of incomplete personal data. You may update certain information directly through your client portal or by contacting us at hello@docree.com.

## 10.4 Right to Erasure

10.4.1 You have the right to request the deletion of your personal data where it is no longer necessary for the purpose for which it was collected, where you have withdrawn consent, or where there is no overriding legitimate ground for processing. Please note that we may be unable to comply with erasure requests where retention is required by law or for the establishment, exercise, or defence of legal claims.

## 10.5 Right to Data Portability

10.5.1 You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller where the processing is based on consent or contract and is carried out by automated means.

## 10.6 Right to Restrict Processing

10.6.1 You have the right to request that we restrict the processing of your personal data where you contest the accuracy of the data, where the processing is unlawful, where we no longer need the data but you require it for legal claims, or where you have objected to processing pending verification of our legitimate grounds.

## 10.7 Right to Object

10.7.1 You have the right to object to the processing of your personal data where we rely on legitimate interests as the legal basis, including profiling based on legitimate interests. You also have the right to object at any time to the processing of your personal data for direct marketing purposes.

## 10.8 Right to Withdraw Consent

10.8.1 Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## 10.9 Right to Lodge a Complaint

10.9.1 You have the right to lodge a complaint with the relevant data protection authority in British Virgin Islands or in your country of residence if you consider that our processing of your personal data infringes applicable data protection laws.

HOW TO EXERCISE YOUR RIGHTS

To exercise any of the above rights, please submit a written request to our Data Protection Officer at dpo@docree.com. We will respond to your request within 30 days. In exceptional circumstances, this period may be extended by a further 60 days, in which case we will notify you of the extension and the reasons for it.

SECTION 11

# Security Measures

11.1 We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures are designed in accordance with industry best practices and applicable regulatory requirements, and include:

- Encryption: All data transmitted between your browser and our servers is encrypted using TLS (Transport Layer Security). Sensitive data at rest is encrypted using AES-256 encryption or equivalent standards.
- Access controls: Access to personal data is restricted to authorised personnel on a need-to-know basis. Multi-factor authentication is enforced for system administrators and employees with access to Participant data.
- Network security: Firewalls, intrusion detection systems, and continuous monitoring are deployed to protect our infrastructure against cyber threats.
- Regular audits: We conduct periodic security assessments, penetration testing, and vulnerability scans to identify and remediate potential weaknesses.
- Employee training: All employees and contractors receive regular data protection and information security training.
- Incident response: We maintain a documented incident response plan to ensure that any personal data breach is detected, reported, and managed in accordance with applicable requirements, including notification to the relevant authority where required.

11.2 While we take all reasonable precautions, no method of transmission over the internet or method of electronic storage is completely secure. We cannot guarantee the absolute security of your data.

SECTION 12

# Contact Information

12.1 If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, please contact our Data Protection Officer using the details below:

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| Data Protection Officer | Docree Demo Funding Ltd — DPO |
| Email | dpo@docree.com |
| Postal Address | Sample Address, P.O. Box 000, Road Town, Tortola, British Virgin Islands |
| Website | https://docree.com |

12.2 We will endeavour to respond to all data protection enquiries within 30 days of receipt. If you are not satisfied with our response, you have the right to lodge a complaint with the competent data protection supervisory authority in your jurisdiction.

12.3 We reserve the right to update or amend this Privacy Policy at any time to reflect changes in our data processing practices, legal or regulatory requirements, or business operations. Where we make material changes, we will notify you by publishing the updated policy on our website and, where appropriate, by sending a notification to the email address associated with your account.

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| Document | Privacy Policy |
| Company | Docree Demo Funding Ltd |
| Effective Date | November 28, 2026 |
| Website | https://docree.com |
| DPO Contact | dpo@docree.com |

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