

# Trumid Privacy Policy

**Effective Date: June 9, 2025**

At Trumid (Trumid Financial LLC and its affiliated companies, referred to throughout as “Trumid,” “we,” “us,” or “our”), we are committed to safeguarding your privacy and protecting the confidentiality and security of personal information that we collect from users of our websites, clients, and business partners. This Privacy Policy describes how we collect, use, disclose, and protect your information in connection with our websites, platforms, and financial services (the “Services”).

## 1. Who This Policy Applies To

This policy applies to all users of Trumid’s website and platforms, including institutional clients, representatives of firms, and visitors who interact with our Services electronically or otherwise. This policy does **not** apply to Trumid employees; a separate policy is maintained for staff.

## 2. Information We Collect

### Information You Provide Directly:

- Name, job title, business email address, phone number, firm affiliation
- Information provided through online forms, subscriptions, or direct communications
- Information collected when opening or managing an account

### Information Collected Automatically:

- IP address, device identifiers, browser type
- Website usage data (pages visited, interactions)
- Cookie and tracking data (see Cookies and Tracking below)

### Information from Third Parties:

- Public sources (e.g., government watchlists, sanctions databases)
- Referrals or business partners for onboarding or verification

## 3. Use of Personal Information

We use your information to:

- Establish and maintain client relationships
- Facilitate trading and financial services
- Process transactions and support trading activity
- Respond to inquiries and provide customer support

- Comply with legal, regulatory, and audit obligations
- Detect and prevent fraud or unauthorized access
- Conduct analytics to improve our services

We limit the collection and use of personal data to what is necessary to provide our services and comply with our regulatory responsibilities.

#### 4. Legal Basis for Processing (EU/EEA/UK residents)

Under the GDPR, our legal basis for processing personal data includes:

- **Performance of a contract** with you
- **Compliance with legal obligations**
- **Legitimate interests** (e.g., fraud prevention, product improvement)
- **Your consent**, where explicitly obtained

You have rights under the GDPR including access, correction, erasure, objection, and data portability. To exercise these rights, contact us at: [privacy@trumid.com](mailto:privacy@trumid.com)

#### 5. Sharing of Information

We may share your information:

- With your employer or organization (if using our services as a firm representative)
- Within the Trumid group of companies
- With service providers who support our infrastructure (e.g., AWS, Google Cloud, analytics and compliance partners)
- With regulators, law enforcement, or when legally obligated
- In connection with a merger, acquisition, or corporate restructuring

We do **not** sell personal data or share it for third-party marketing.

#### 6. Data Security

We maintain robust physical, technical, and administrative safeguards to protect personal data, including:

- Access controls and authentication
- Encryption and secure storage practices
- Regular audits and system monitoring

#### 7. Retention of Personal Data

We retain personal data only as long as necessary for:

- Fulfilling our contractual obligations
- Meeting legal and regulatory requirements

- Business continuity and internal reporting

Data no longer required is securely deleted or anonymized.

## 8. Your Rights

### For EU/EEA/UK Residents:

You have the right to:

- Access and obtain a copy of your data
- Request corrections or deletion
- Object to processing or request restriction
- Withdraw consent
- Lodge a complaint with a supervisory authority

### For California Residents:

Under the CCPA, you have the right to:

- Know what personal data we collect and how we use it
- Request deletion of your data
- Opt out of data sale (Trumid does not sell personal data)
- Non-discrimination for exercising your rights

Submit CCPA-related requests at: [privacy@trumid.com](mailto:privacy@trumid.com)

## 9. Cookies and Tracking

We use cookies and similar tracking technologies to:

- Enhance user experience and platform functionality
- Monitor usage metrics
- Personalize content and remember user preferences

You may manage cookie settings via your browser or read our [Cookie Policy](#).

## 10. International Transfers

As a global firm, we may transfer your data to jurisdictions outside your home country, including the U.S., EU/EEA or UK. We ensure that such transfers are protected through:

- Standard Contractual Clauses (SCCs)
- Data processing agreements with third parties

## 11. Monitoring and Communications



Trumid may monitor or record communications, including emails and calls, for:

- Compliance and regulatory obligations
- Quality assurance and security
- Business continuity

## 12. Changes to This Privacy Policy

We may update this policy from time to time. When we do, we will revise the “Effective Date” and post the updated version on our website. Continued use of our services after an update constitutes agreement to the revised policy.

## 13. Contact Us

For any privacy-related inquiries or to exercise your rights:

**Email:** [privacy@trumid.com](mailto:privacy@trumid.com)

**Mailing Address:**

Trumid Financial LLC  
1411 Broadway, 24th Floor  
New York, NY 10018