



**CENTRADE**

# Privacy Policy for Centrade Website:

Effective May 1, 2021

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Welcome to the website of Centrade Inc. (collectively with any subsidiaries and affiliates, "Centrade", "Company", "we", "us", or "our"). We have prepared this Privacy Notice ("Privacy Notice") to explain how we collect, use, protect, and disclose your information when you use websites on which this Privacy Notice appears ("Sites").

## Scope

This Policy applies to all Centrade Website visitors.

Use of the Centrade Platform is governed by a separate agreement that also covers the use and processing of data provided by Clients and their authorized users, (collectively, "Client Data"), which may include Personal Information. The organization (e.g., your employer or another entity or person) that entered into the Subscription Agreement with Centrade controls their instance of the Centrade Platform (their "Instance") and any associated Client Data. If you have questions about specific Instance settings and privacy practices, please contact the Client whose Instance you are using. If you have received an invitation to join an Instance but have not yet created an account, you should request assistance from the Client that sent the invitation.

## What Information Does Centrade Gather?

When you visit our Website, Centrade collects information about your visit in order to provide you with Centrade services and products, allow us to understand how visitors navigate our Website, and use our Services.



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## Information Provided By You

You have the option of writing us by email at [info@Centrade.io](mailto:info@Centrade.io) to give us your name, email address, phone number, and other information, which we will use to respond to your inquiries about Centrade, and to send you news about Centrade-related services, products, or promotions. We may use a service provider to send or administer these messages, but we will never share or sell the information you provide with spammers or any other third parties without your consent. We will provide you with any personal information submitted by you to us by email upon request.

## Online Tracking

When you visit Centrade's Website, we and our third-party partners analyze log file information and other data collected through cookies, web beacons, and other tracking technology, to collect information about your browsing behavior. This information may include, for example, your browser type, domains, page views, IP address, referring/exit pages, information about how you interact with our Website and links, traffic and usage trends, etc. We may use session or persistent cookies to keep you logged in while you use features of our website or online services, and which may allow us to recognize you when you return to the Website.

Although most Internet browsers automatically accept cookies, some permit you to change your settings to stop accepting cookies or to ask you before accepting a cookie from a website that you visit. If you change your settings to reject cookies, parts of our Website may not work for you.

Centrade respects Do Not Track ("DNT") settings in browsers. If you are logged out of our services and have DNT enabled, we will not set cookies that can be used to aggregate information about your usage. We may use some cookies to enhance your experience by storing preferences or options.



# Privacy Policy for Centrade Website:

## Third-Party Sites

Our Sites and Centrade Platform may contain links or integrate with other websites and online services, or allow others to send you such links. Centrade is not responsible or liable for any damage or loss related to your use of any third-party website or online service. You should always read the terms and conditions and privacy policy of a third-party website or online service before using it, whether directly or in connection with your use of the Sites or Services. Third parties may collect, but we do not authorize them to collect, personally identifiable information about your online activities over time and across different websites when you use the Sites or Centrade Platform.

## Children's Privacy

Our Website does not knowingly collect or store any personal information about children under the age of 13.

## How Will Centrade Share the Information It Collects?

We do not share or sell your personal information to any third-party company or organization outside the Centrade network, for any commercial or marketing purpose, without asking you first. The following are the limited situations in which we may share your information.

## Who We Share Your Personal Information With

You may make certain of your Personal Information available to others, such as your name or username, for example when you create a profile or submit public queries. This information may be accessed by users who use the Sites or Centrade Platform and may be accessed by commercial search engines such as Google, Yahoo, and Bing to the extent that such engines are permitted to access the Sites or Centrade Platform.

We may disclose your Personal Information to the following categories of recipients:



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- our third-party service providers who provide data processing services to us (for example, to support the delivery of the Centrade Platform); and other businesses that we believe to be trustworthy and have privacy practices consistent with ours (“Subprocessors”). For example, we may contract with Subprocessors to provide certain services, such as hosting and maintenance, accounting, data analytics, data storage and management, and marketing and promotions, most of which are located in the United States. We only provide our Subprocessors with the information necessary for them to perform these services on our behalf. Each Subprocessor must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, to protect your Personal Information from unauthorized access, use, or disclosure. Subprocessors are prohibited from using Personal Information other than as specified by Centrade. Each Subprocessor shall also agree to provide the same level of privacy protection as Centrade, and notify Centrade if they make a determination that they can no longer provide the same level of privacy or security as Centrade.
- in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Centrade will cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other content and information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to or comply with legal requests (including court orders and subpoenas), to protect the safety, property, or rights of Centrade or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law;
- a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Information only for the purposes disclosed in this Privacy Notice; and



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- any other person with your consent to the disclosure.

### Security

At Centrade, we're serious about information security, and we have developed and implemented numerous security measures and processes governing information technology and data user behavior. These cover areas such as access control, authentication, audit, monitoring, alarms, data storage and back up, transmission standards and environment integrity. We use reasonable endeavors to install and have appropriate security measures in place in our systems and facilities to protect against the loss, misuse or alteration of information that we have collected from you. You should be aware that no data transmission over the internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through the Sites or Centrade Platform, we cannot and do not guarantee the security of any information you transmit on or through the Sites or Centrade Platform, and you do so at your own risk. If you have any questions about the security of your Personal Information, you can contact us using the information provided in the How to Contact Us section below.

Centrade cannot guarantee that unauthorized third parties will never be able to defeat our security measures or use your personal information for improper purposes. In the event that any information in our possession or under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

### Data Retention and Deletion

We will retain the information that you provide only as long as needed to provide you services. We may retain your personal information after you have closed your account if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes between Centrade users,



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prevent fraud or abuse, or enforce this Policy and our User Agreement. You can request to delete your personal information from Centrade's servers via an email request to [privacy@Centrade.io](mailto:privacy@Centrade.io). Because of the way we maintain certain Services, after your information is deleted, backup copies may linger for some time before they are deleted, and we may retain certain data for a longer period of time if we are required to do so for legal reasons.

## California Residents

Centrade has not sold Personal Information in the preceding 12 months as the terms are defined under the California Consumer Privacy Act of 2018 ("CCPA"). As a California resident, you may have certain rights regarding your Personal Information, including:

- The right to know what Personal Information we have collected, disclosed, or sold
- The right to request deletion of your Personal Information
- The right to opt-out of the sale of your Personal Information (\*note that Centrade has not sold Personal Information in the preceding 12 months)
- The ability to exercise your rights through an authorized agent, which may require further verification by us
- The right to treatment that's free from discrimination for exercising your privacy rights under the CCPA

If you have questions about these rights or if you wish to exercise your rights under the CCPA, please contact us at [privacy@Centrade.io](mailto:privacy@Centrade.io). When submitting a request please include your name and the email address associated with the Personal Information in order to help us verify and process your request. We will attempt to process such requests in a timely fashion, but we will notify you if we require additional time. Our fulfillment of verified requests is subject to applicable exemptions under the CCPA.



# Privacy Policy for Centrade Website:

## International Visitors

The Centrade website is hosted in the United States and is intended for United States visitors. If you are accessing the site from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, be advised that you are transferring your personal data to the United States and that, by providing your personal data, you consent to that transfer.

EEA Residents: If you reside in the EEA and would like to access, review, update, rectify, object to processing, or request portability or deletion of any Personal Information for which Centrade is the controller, or exercise any other data subject right available to you under the under the EU General Data Protection Regulation please contact us through [privacy@Centrade.io](mailto:privacy@Centrade.io).

Similarly, if we have collected and process your Personal Information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

We respond promptly to all requests we receive from individuals wishing to exercise their data protection rights, and at the latest within a month.

You also have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA, Switzerland, and certain other countries (including the US) are available here at: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)



# Privacy Policy for Centrade Website:

Please note that we may still use any aggregated and deidentified Personal Information that does not identify any individual, and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

As described above, in situations when Personal Information has been collected by a Client that has contracted with us for use of the Services, you should contact the Client directly to exercise your data protection rights, and refer to their separate privacy notices.

## Your Choices

Upon request, individuals who wish to view, verify, correct, opt out of certain uses of, or remove their information collected under this policy, may contact Centrade at [privacy@Centrade.io](mailto:privacy@Centrade.io). In compliance with the Privacy Shield framework, individuals have the right to access the personal information about them and be able to correct, amend, or delete that information where it is inaccurate, or has been processed in violation of the Principles, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

## Notification of Changes to This Privacy Policy

We may revise this Policy from time to time. The most current version will govern our use of your information. If we make a change to this Policy that, in our sole discretion, is material, we will notify you via an email update using an email address associated with your account. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Policy.





# Privacy Policy for Centrade Website:

## How to Contact Us

If you have questions or concerns about our use of your Personal Information, please contact us at:

Centrade, Inc.  
1300 Mendota Heights Road  
Mendota Heights, MN 55120  
United States

For General Inquiries:  
[info@Centrade.io](mailto:info@Centrade.io)