

Napoleon Index Privacy Policy

This privacy policy explains the manner in which Napoleon Index SAS and its subsidiaries (“Napoleon Group”) we collect and maintain non-public information about our customers (such as your full name, mailing address, identification number, passports, driver’s license etc., hence forth “Information”). Each member of the Napoleon Group is subject to the applicable privacy laws in its state of incorporation. This Privacy Policy Statement outlines how we manage and protect the personal information you give us and hold about our users and customers (The “Policy”).

Downloading, installing and your access to and use of our websites, applications and signal platforms constitutes your acceptance of the Policy and any other legal notices and statements contained on this website, our platforms and/or our applications. Your use of the Napoleon websites, platforms and applications is governed by the version of the Policy in effect on the date each Napoleon website is accessed by you. Please feel free to contact our customer support team at privacy@napoleon-index.com for any clarifications before you continue to use our websites and platforms.

When do we collect information from you?

We collect information from you when you open an account and provide us with Information through electronic registration forms. The Information we collect directly from you includes Information required to communicate with you such as your address, phone number, e-mail. Furthermore, we may collect other identifiable Information such as your full name, gender, address, date of birth, identification number, passports, identity card, driver’s license, social security number and/or other identification number. We may also need to evaluate your trading experience, average annual income or estimated net worth.

How do we collect Information?

You directly provide us with most of the Information we collect. You do this by filling out the electronic form that we post on our websites/platforms/applications and by voluntarily providing us with other required documents. Additionally, you provide us with Information by browsing on our platform, by contacting us or responding to a promotion. The information we indirectly collect may include logging your Internet Protocol (IP) address, software configuration, operating system and use of Cookies; Cookies are small files sent from us to your computer and sometimes back. Cookies ultimately help us improve your navigation and ease of use of our website. Cookies do not contain any personally identifiable information. The cookie permission settings in your web browser implies consent to our cookie policy.

How do we use the Information collected?

Use of Information

We use your personal details and information obtained from other sources for the purpose of satisfying regulatory and legal requirements, for marketing, administration and customer services, to ensure that the content and services that we offer are tailored to your needs and interests. We keep your information for a reasonable period for these purposes. We may need to share your information with our service providers and agents. Generally, we require that third party organizations who handle or obtain personal information as service providers acknowledge its confidentiality and undertake to respect an individual’s right to privacy and comply with Data Protection principles including this Policy. For example, We may also use this Information log your activity and contact you from time to time.

We or agents acting on our behalf may perform identity, money laundering and fraud prevention checks and may pass your details onto other group companies and other organizations (including law enforcement agencies) involved in fraud prevention and detection who may use your information in the same way and/or investigate your credit standing and in doing so may contact banks, financial institutions and credit reference agencies.

The Information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you. Should you ever deactivate your account with us, we will keep your information on file, but only use it to comply with regulatory requirements and to contact you occasionally with the option to reactivate your account. Please note that you may opt out of our Information sharing policies at any time by notifying us of your desire to do so as explained below.

We may use the information you provide us to send you SMS or email communications.

By providing us with your personal information you consent to our processing your personal data for the above purposes. You also consent to our transferring your information, for the above purposes, to countries or jurisdictions which may not provide the same level of data protection as your country of residency.

Sharing Information

We do not disclose or share Information about any of our users (whether active or inactive) to any non-affiliated third parties other than in the manner and entities set forth below:

- To service providers for the purpose of assisting in the efficient provision of our services to you.
- To respond to a subpoena or court order, judicial process or to regulatory authorities, either having jurisdiction over us or over our customers/users; and
- To protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities.

Security and Integrity of Information

We protect your Information by using data security technology and using tools such as firewalls and data encryption. We also require that you use a personal username and password every time you access your account online. We restrict access to Information at our offices so that only officers and/or employees who need to know the Information have access to it.

Changes to this Privacy Policy

This Policy will be reviewed from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. Any information held will be governed by our most current Policy.

Links

Our website may contain links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any web site that you may link to from our website that collects any information over the web. Our terms of use and our privacy policy apply only to information collected by us in accordance to this Policy.

Updating Your Information

In the event that you believe our Information is in anyway inaccurate, please let us know immediately. We will make sure we investigate the matter and correct any inaccuracies as quickly as possible where necessary.

Questions

Should you have any questions regarding our privacy policy, please contact us at privacy@napoleon-index.com. Please include your name, mailing address, email and telephone number.