

eToro Privacy Policy

This privacy policy (the "**Policy**") outlines how eToro Group Limited, eToro (Europe) Limited, eToro UK Limited, eToro X Limited, eToro USA LLC and/or additional eToro Group entities to whose services/website you have registered (collectively "**eToro**", "**we**" or "**us**" and the member of the eToro group to whose services you registered, the "**eToro Entity**") collects, uses and manages the personal information of its users and customers. We encourage you to read the Policy carefully as it forms part of the relevant eToro Entity's terms and conditions, terms of business and/or terms of use, as the case may be. For the purposes of applicable data protection laws, the eToro Entity is the "controller" of personal information collected through www.etoro.com, other eToro Group's websites, widgets, mobile applications and other platforms (together the "**Site**"), and is the company you should contact if you have questions about the use of your personal information (see the "**Contact Us**" section below).

How we collect personal data

When you sign up or register for an eToro account and/or services

If you sign up for an eToro account and/or services, we will collect basic information about you including your name, email address and telephone number. You may provide this information to us directly, or by signing in to your account/service with a third party, including without limitation, Facebook or Google (see "**Third Party Data Collection**" below). We will use the information that we collect about you to:

- create and maintain your account;
- allow you to log in to eToro;
- contact you about your account and/or the services that eToro offers (see "*eToro Updates*" below).

When you provide information to build your Profile

Once you have created an eToro account, we will ask you to provide additional information about yourself to complete your "**Profile**". The information we ask for may include your gender, date of birth, address, national insurance number (or other government-issued identification number), citizenship and residency status, Tax ID, and information about your experience of trading, education, source of income, investment aims and appetite, occupation, employer and employment position, annual income, investment portfolio, total cash and liquid assets and such other details/questions as may be required in the Profile creation process, as may be amended by us from time to time. We will also ask you to provide a copy of an identification document, such as a passport or national identity card, a utility bill and such other documents as may be required by us in order to comply with our regulatory obligations. Further details about the identification process can be found in the relevant eToro Entity's terms and conditions, terms of business and/or terms of use, as the case may be. We will use the information you provide in your Profile to:

- verify your identity and carry out checks that we are required to conduct by applicable laws and regulations, including without limitation, "know your client", anti-money laundering, fraud, sanctions and politically exposed person checks;
- contact you on matters related to your account, including without limitation, to request any additional information and/or documentation;
- tailor the products and services offered through the Site to you, including without limitation, to perform any suitability or appropriateness assessments for using our services and/or products, such as our high-leveraged trading services and Social Trading Features;
- assess your credit risk;
- assess your risk score according to parameters determined by eToro;

- assess whether you qualify as a professional client;
- maintain administrative records relating to our business;
- set up security measures to secure your account, including without limitation, carry out two-factor authentication; and
- provide you with notices related to your account, general updates, market updates and other marketing materials, including without limitation, the services and products offered by the members of the eToro Group.

You do not have to complete your Profile, however if you choose not to then we may be unable to make eToro's full functionalities available to you.

You can update your Profile at any time by visiting the "Account" page in the Settings menu. We recommend that you update your Profile regularly, to ensure that the eToro functions offered to you are appropriate for your current circumstances. You further agree to update such information upon eToro's request, if eToro considers the information provided as untrue, incorrect, incomplete and/or inconsistent with other information provided by you at any time. You acknowledge that we may rely upon such information and that you are responsible for any damages or losses which may result from any inaccuracies, including without limitation, the inappropriateness of a service/product to your profile.

We may also collect personal information about you from third party entities when we seek to verify your identity as part of our regulatory requirements. This may include, for example, identity verification agencies, credit referencing agencies and similar bodies.

When you trade using eToro (real and/or virtual accounts)

We will keep records of all activities on the Site, including without limitation, any content you may post, any visited pages, your account details, including (but not limited to) the time, value and currency of any deposit/withdrawal and/or transaction made, any money movements, the payment method, device used and/or your IP addresses and any other network identifiers. We use this information for the following purposes, in addition to those set out in the "When you sign up or register for an eToro account and/or services", "eToro Social Trading Platform" and "When you provide information about your profile" sections above:

- to comply with our regulatory and other legal obligations;
- to monitor any content you may post;
- to administer transactions including deposits, chargebacks and payments;
- to monitor trading activity on eToro, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities; and
- to determine whether a payment method is being abused.

When you contact Us

If you contact us by telephone, email, post or using another function offered by eToro, e.g. chat, We will collect any information that you choose to give Us. We will use this information to review, investigate and respond to any comment or question that you may raise. Please note that we record all telephone calls made to us.

When an eToro user invites you to use eToro

Users of eToro can invite their contacts to sign up for an account with Us. We only collect the email addresses of individuals that users choose to invite to join eToro, and eToro will use them only for the purpose of sending an invitation to the individual at the request of the existing eToro user.

Information we collect automatically from you

The information we automatically collect may include your Internet Protocol (IP) address, software configuration, aggregate use information, geographical location data, operating system and use of Cookies. If you do not have an eToro Account, we will not usually be able to identify you from this information

Cookies are small files sent from us to your computer where they are stored and may be read. You can find out more about eToro's use of Cookies in our Cookie Policy (available at: www.etoro.com/customer-service/cookies/).

Third Party Data Collection

When you use or connect to eToro by or through a Third Party Platform, such as Facebook or another site, you allow us to access and/or collect certain information from your Third Party Platform profile/account (or via any cookies placed on your device by such Third Party Platform), as permitted by the terms of the agreement and your privacy settings with the Third Party Platform. We will share such information with the Third Party Platform for their use.

We will share some of the information we collect from you on install of the mobile app with vendors and other service providers who are engaged by, or working with, us in connection with the operation of the services we provide to you. This may also be shared with these parties for analytics purposes, which may require the reproduction and display of your information in an aggregated and anonymized manner that will not in any way identify you.

How we may share your personal information

We will disclose the personal information we hold about you to:

- our group companies and affiliates;
- eToro's service providers, including IT hosting companies;
- banks, other financial institutions and credit reference agencies;
- payment service providers;
- third party companies in the event that eToro is involved in a corporate transaction such as an actual or potential merger, joint venture, consolidation or asset sale;
- professional advisors such as attorneys, accountants, auditors, financial and other professionals;
- regulatory authorities including tax authorities;
- law enforcement agencies, courts and other relevant tribunals.

We process your personal information using data centers located inside the European Union and data centers located outside the European Union, including in Israel (where laws have been recognised as providing the same level of data protection as in the European Union). If you would like further information about the safeguards in place for transfers of personal information to our group companies or other third parties outside of the European Union, under the applicable data protection laws, please contact us (see "*Contact Us*" below).

Automated analysis of your personal information

We will use the personal information you provide to us, or that we gather when you use eToro, to tailor eToro to your Profile and to assign you a risk score. eToro will carry out this analysis automatically, and in most cases without human intervention.

You can update the information in your Profile at any time by visiting the "Account" page in the Settings menu. We recommend that you update your Profile regularly, to ensure that the eToro functions offered to you are appropriate for your circumstances.

If you have any questions about the automated analysis of your personal information, please contact us (see "Contact Us" below).

Our legal basis for using your personal information

Entering into and performing the contract with you: If you have an eToro account or have registered to the Site or service, our legal basis for processing your personal information is that it is necessary for the performance of the relevant eToro Entity's terms and conditions, terms of business and/or terms of use, as the case may be, and to provide a service to you. With respect to an eToro account, this includes facilitating access to our platform, processing payments and executing trades.

For other justifiable grounds, including legal obligation and legitimate interests: We process your personal information where necessary for eToro to comply with legal and regulatory obligations we are under, and also where it is necessary for legitimate interests we have in conducting our business. These include without limitation:

- Learning about your interests and preferences to contact you with information that is relevant to you and helping us target marketing communications and adverts so that they are more relevant to you.
- Using your pseudonymised details to show you advertising on social media platforms, such as Facebook or via other third party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
- Analysing and continually improving the Site and our services and helping us pilot test versions of the Site internally to develop new features and ensure the efficient running of eToro's services.
- Detecting and reducing fraud and credit risk.

eToro Social Trading Platform

eToro is a real-time social trading platform, which integrates rich community and social characteristics into the trading platform. **As part of the eToro traders' network, traders who choose to be part of the community share their strategies and performance with the community.** The amount traded is never disclosed and all traders are required to agree to be part of the network and share their strategies and performance.

Downloading, installing and your access to and use eToro constitutes your agreement and acknowledgment that the following information and content shall be considered non-confidential and non-proprietary information (other than your personal data as described below), collectively, the "**Content**" and **shall be publicly shown on the Site:** your username and full name, your picture/avatar (if provided), your state of residency, gender, networks, list of users who follow you, users who copy you etc., list of users you follow or copy, and any network status/posts/blogs and any other content options that enable our users to interact amongst themselves, including without limitation content and information you post on the eToro community, comments, feedback, postings, "likes", blogs and/or all information that You provide to Us via our website, our mobile apps, and/or by email, chat, fax or telephone and/or any other means.

In addition, if you have elected to use one of our applications provided via social networks (such as Facebook, Twitter, G+ etc.), our application will access your social network account general information which includes your name and username in such social network, profile picture, gender, networks, user ID, list of friends, and any other information you have shared with "everyone" on the relevant social network. Additional information may be collected in specific social networks campaigns as shall be specified in the terms and conditions applicable to such campaign.

You can change your privacy settings at any time, and can make your trading activity private by clicking [here](#).

eToro Updates

If you sign up for an eToro account, Site and/or service, we may use your personal information to send you inapp push notifications, SMS or email communications. These communications may relate to your trading activity, account status, social interactions on eToro, market volatility, or may include eToro updates and promotions. You can opt out of receiving updates at any time by clicking the "Unsubscribe" link at the bottom of any email from eToro, or by visiting the "Notifications" tab in the "Settings" menu.

Retention of personal information

The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. For example, if you are invited to use eToro by another user, we will store your personal information for a period of six months in order to send an invitation to you by email.

If you have an account with eToro, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us.

Your rights

Individuals whose personal information we hold may be entitled to access their personal information, or to request that it is erased, that its processing is restricted, or that any inaccurate personal information is rectified. You may also have the right to object to the processing of your personal information, or in some circumstances to obtain a copy of the personal information in machine readable format. Any such request should be submitted in writing to: www.etoro.com/customer-service/. Individuals also have the right to complain about the use of their personal information to the Supervisory Authority, which in the UK is the Information Commissioner's Office (www.ico.org.uk) and in Cyprus is the Office of the Commissioner for Personal Data Protection (www.dataprotection.gov.cy).

Security and Integrity of Information

We protect your personal 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. As set out in the relevant eToro Entity's terms and conditions, terms of business and/or terms of use, as the case may be, you must not share your password with anyone else. We restrict access to personal information at our offices so that only officers and/or employees with a genuine need can access it.

Minors

eToro is not available for users under the age of 18 (or the age of legal consent for the jurisdiction the user is located in) (a "minor"). We do not knowingly collect personal information from or about minors. If you are a minor, you should not download or use any of our services nor provide any personal information to us.

If we become aware that a minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at <http://www.etoro.com/support>.

Changes to this Privacy Policy

The 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 personal information held will be governed by our most current Policy.

Links

The Site may include 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 such websites. Our terms of use and our privacy policy apply only to information collected by us in accordance with this Policy.

Contact Us

Should you have any questions regarding the Policy, please contact us at: privacy@etoro.com. Please include your name, and mailing or email address.