
MILTRADERS LLC-FZ

PRIVACY POLICY

Version 2.0

Effective Date: March 1st, 2026

Last Updated: March 1st, 2026

Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, UAE
Commercial License Number: 2643914.01 — Meydan Free Zone Authority

PLAIN LANGUAGE NOTICE

MILTRADERS LLC-FZ (hereinafter referred to as "MILTRADERS", "we", "our" or "the Company") respects your privacy and is committed to protecting it through compliance with this Privacy Policy.

The purpose of this Privacy Policy is to clearly and transparently explain how we collect, use, share, and protect your personal information when you visit our website (the "Site"), use our trading simulation services (the "Services"), or interact with us in any way.

This Privacy Policy applies to all users of the Site and Services, including residents of the European Union, France, the United States, and any other country, and includes disclosures required by applicable data protection laws, including but not limited to the General Data Protection Regulation of the European Union (RGPD - Regulation EU 2016/679), the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), and any other applicable privacy and personal data protection legislation.

Please note that third-party websites to which our Site may refer, provide a link, or otherwise facilitate access, are not covered by this Privacy Policy, and such websites are not subject to our privacy standards and procedures. We encourage you to check with each third-party provider regarding their own privacy practices and procedures before providing them with personal information.

If you do not accept the provisions set forth in this Privacy Policy, you must not use MILTRADERS Services. Any capitalized term not defined in this Policy shall have the same meaning as defined in the applicable User Agreement.

ARTICLE 1: IDENTITY OF THE DATA CONTROLLER

Personal Data Controller

Field	Details
Company	MILTRADERS LLC-FZ

Field	Details
Legal Form	Limited Liability Company (LLC) under Emirati law (UAE)
Registration	Meydan Free Zone, Dubai, United Arab Emirates
Registration Authority	Meydan Free Zone Authority
Business License	2643914.01
Registered Office	Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, UAE
Legal Representative	Cyril Martini, Managing Director
Data Protection Contact	privacy@miltraders.com
Website	www.miltraders.com

Data Protection Officer (DPO): For any questions regarding your personal data or to exercise your rights, please contact our dedicated team at: privacy@miltraders.com

ARTICLE 2: WHAT PERSONAL INFORMATION DO WE COLLECT?

When you visit the Site, communicate with us, subscribe to a Challenge, a Pro evaluation, or an Instant Funded Account, access your Account, conduct a transaction, or interact in any way with MILTRADERS, we collect and store certain personal information about you, as well as non-identifying information, in accordance with the categories defined by applicable data protection regulations.

The categories of personal data we are likely to collect include, but are not limited to, the following:

2.1 Identifiers and Contact Information

We collect the following identification and contact information, which is necessary to create and manage your account, communicate with you, and provide our Services:

- Full name (surname and first name)
- Email address
- Full postal address (street, city, postal code, country)
- Phone number (landline and/or mobile)
- Date of birth
- Nationality
- IP Address (Internet Protocol)
- Login credentials (username, encrypted password)
- Social Security Number, Tax Identification Number, or equivalent depending on your country of residence (if required for tax or regulatory reasons)
- National Identification Number or any other government identifier

This information is collected primarily during your registration on the Site, account creation, or during subsequent communications with our customer support team.

2.2 Identity Verification Documents (KYC - Know Your Customer)

In accordance with international Anti-Money Laundering (AML) and Know Your Customer (KYC) regulations, we collect and store the following documents to verify your identity before approving any profit withdrawal (payout):

- Official government-issued photo ID (national identity card front and back, passport, valid driver's license)
- Recent proof of address (dated within less than three months) such as a utility bill (electricity, gas, water, telephone), bank statement, tax notice, or any other official document attesting to your residential address
- "Selfie" type photograph showing you holding your ID next to your face (if this additional verification is requested by our security systems)
- Verification videos showing you in front of your trading computer, with your face visible, your ID, and your trading platform open (if requested as part of our enhanced verification procedures before approving certain payouts)
- Corporate documents (articles of association, certificate of incorporation) if you register as a legal entity
- Any other identification or verification document that we might reasonably request to comply with our legal obligations or to prevent fraud

These documents are collected via our secure platform (dashboard) or by email at verification@miltraders.com, and are stored securely and encrypted in accordance with industry best practices.

2.3 Account and Transaction Information

We collect and maintain all information related to your use of our Services, including:

- Application and registration data (forms filled out, information provided during account creation)
- Complete simulated trading history (all executed trades, opening and closing dates and times, traded instruments, position sizes, entry and exit prices, realized and unrealized profits and losses)
- Order activity (orders placed, modified, canceled, executed)
- User preferences (account settings, notification preferences, language, time zone)
- Account status (Active Challenge, Active Pro, Passed Evaluation, Failed Evaluation, Active Funded Account, Active Instant Account, Closed Account, etc.)
- Subscription and payment history (subscription dates, renewals, cancellations, amounts paid)
- History of purchased Resets
- Payout requests (amounts requested, dates, approval or denial statuses, amounts paid)
- Communications with customer support (tickets, emails, messages in the dashboard)
- Responses to questionnaires about your trading strategies

This data is essential to provide our Services, evaluate your performance, detect rule violations, and process your profit withdrawal requests.

2.4 Commercial Information

We maintain records of Services you have purchased, considered purchasing, or subscribed to, including:

- Type of account subscribed (50K, 100K, 150K)
- Program chosen (Challenge, Pro, or Instant)
- Price paid and promotions applied
- Invoice history
- Payment methods used (card type, last digits)

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- History of Resets and account repurchases

2.5 Internet and Electronic Network Activity

When you use our Site or Services, we automatically collect certain technical and usage information via cookies, web beacons, and other similar tracking technologies:

- Web browser type used (Chrome, Firefox, Safari, Edge, etc.)
- Operating system (Windows, macOS, Linux, iOS, Android)
- Unique Device Identifier (Device ID)
- Screen resolution and device type (desktop, tablet, smartphone)
- Browsing history on our Site (pages visited, duration of visit, navigation paths)
- Referring pages (where you came from before arriving on our Site) and exit pages
- Cookies and similar tracking technologies (see our Cookie Policy for more details)
- Timestamps of all your actions on the Site and in your account
- Interactions with Site elements (clicks, scrolling, forms filled)

This information allows us to improve user experience, analyze Site performance, detect technical issues, and prevent abuse or fraud.

2.6 Geolocation Data

We collect information related to your geographical location in several ways:

- Location provided directly by you during registration (postal address, country of residence)
- Location inferred from your IP address (generally at the city or region level)
- Location obtained from third-party geolocation service providers
- Publicly available geolocation data

This information allows us to comply with geographical restrictions, detect the use of VPNs or proxies that may indicate suspicious activity, personalize content according to your region, and prevent fraud.

2.7 Professional or Employment-Related Information

In certain cases, we may collect information related to your professional situation: profession or industry sector, trading experience (beginner, intermediate, advanced), source of income (if relevant for KYC verification), current employer (if voluntarily provided). This information is generally collected on a voluntary basis and helps us better understand our user base.

2.8 Sensitive Information

In accordance with the definitions of applicable data protection laws (CCPA/CPRA, RGPD), we collect certain categories of information considered "sensitive" or "special":

- Login credentials (username and password, stored encrypted)
- Financial data required for payments (processed exclusively by our third-party payment processors Rise, Paymid, or any other payment service provider selected by MILTRADERS, and not stored directly by MILTRADERS)
- Biometric data (photographs of your face via selfies and verification videos, used solely for KYC identity verification)

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- Government identification numbers (Social Security Number, Tax Identification Number, Passport Number)

We collect this sensitive information only when strictly necessary to provide our Services, comply with our legal obligations (KYC/AML), or prevent fraud. We never use it for marketing or advertising purposes.

2.9 User-Generated Content

We collect and store content that you create or voluntarily submit during your use of our Services: comments and messages posted on our forums or communities (if available), customer support tickets and correspondence, participation in webinars or events, screenshots of your trading platform (if provided or requested), responses to questionnaires or surveys, and testimonials or reviews you might submit.

2.10 Inferences and Derived Information

From the information we collect, we may create inferences or profiles regarding your preferences, characteristics, behaviors, and aptitudes, including: your trading skill level, your trading style (scalping, day trading), your risk tolerance, your preferences regarding products or services, your probability of success (predictive analytics for improving our Services), and detection of suspicious behaviors or prohibited practices (fraud, bots, copy trading). These inferences are used exclusively to improve our Services, personalize your experience, detect fraud, and optimize our internal processes. They are never sold to third parties.

2.11 Any Other Similar Information

We reserve the right to collect any other personal information that you choose to voluntarily provide to us, or that we might reasonably need to collect to provide our Services, comply with our legal obligations, or protect our legitimate interests.

ARTICLE 3: HOW DO WE COLLECT YOUR INFORMATION?

3.1 Minimum Age and Protection of Minors

Our Services are intended exclusively for persons aged 18 years or older. We do not knowingly authorize account access for persons under 18 years of age. If we discover that an account holder is under 18 years of age, we may suspend or restrict access to Services until the person reaches the age of legal majority in their jurisdiction of residence.

We do not knowingly collect personal data from children under 13 years of age (or under 16 years where required by the RGPD or any other applicable law). If we learn that we have collected personal data from a child under these ages without appropriate parental consent, we will delete this information as soon as possible.

If you are a parent or legal guardian and you believe that your child has provided us with personal information without your consent, please contact us immediately at privacy@miltraders.com.

3.2 Methods of Collection

A. Directly from you

You provide personal information directly to us when you: fill out the registration form to create a MILTRADERS account, subscribe to a Challenge, Pro evaluation, or Instant Funded Account, update your profile or account information in your dashboard, submit KYC documents (ID, proof of address, selfie, verification video), make a payment (monthly subscription, activation fees, Reset, Instant purchase), request a payout (profit withdrawal), contact our customer support, participate in surveys, questionnaires, or market studies, sign up for our newsletter or

marketing communications, or interact with our educational content, webinars, or events.

B. Automatically via tracking technologies

Certain information is collected automatically when you use our Site or Services, without specific action on your part, via the use of cookies, web beacons, tracking pixels, and other similar technologies: IP Address and connection data, browser type and operating system, pages visited and duration of visit, interactions with Site elements, Site performance data, cookies and session identifiers. For more detailed information on our use of cookies, please consult our Cookie Policy.

C. From third-party service providers

We receive certain information about you from third-party service providers with whom we work to provide our Services:

- Web analytics services (Google Analytics, etc.): Site usage data, browsing behavior, aggregated demographic data
- Payment processors (Rise, Paymid, or any other payment service provider): Payment confirmation, transaction status, billing information (without full card numbers)
- Identity verification services: Validation of your KYC documents, verification of ID authenticity, detection of fraudulent documents
- Trading platform and market data providers (Volumetrica, dxFeed, or any other provider selected by MILTRADERS): Trading data, execution of simulated orders, performance history

D. From public sources

In certain cases, we may supplement the information you provide with information obtained from publicly available sources: public company registries (for business accounts), public databases of sanctions or Politically Exposed Persons (PEP) as part of our AML/KYC obligations, information publicly available on professional social networks (LinkedIn, etc.) if you choose to share them.

E. From other users

In rare cases, we may receive information about you from other users, for example if a user recommends you via our referral program (if available) or if a user reports suspicious behavior.

3.3 Recording of Communications

MILTRADERS reserves the right to record any communication, whether electronic, telephone, in person, or by any other means, that we have with you in relation to the Services we provide. These recordings will be our exclusive property and will constitute evidence of communications between us. Recordings may include: phone conversations with customer support, live chat sessions, email exchanges, messages in the dashboard, and webinars or training sessions in which you participate. These recordings are kept for staff training, service quality improvement, dispute resolution, and regulatory compliance.

3.4 Consent to Transfer and Processing

By using any part of the Site or Services, or by entering your personal information, you hereby consent to the transfer of your personal information to the United Arab Emirates and to the processing of your information, which may take place inside or outside the United Arab Emirates, for the purposes described in this Privacy Policy.

You acknowledge and accept that the data protection laws of the United Arab Emirates may not offer the same level of protection as the laws of your country of origin, particularly if you reside in the European Union or in a State offering enhanced privacy protections.

You may withdraw your consent at any time by submitting a request to privacy@miltraders.com. Please note that if you choose to withdraw your consent, we may not be able to provide you with the requested Services, including access to your account, processing your payouts, or providing customer support.

ARTICLE 4: USE OF PERSONAL INFORMATION

MILTRADERS processes your personal information for a number of legitimate purposes that support our business interests and the provision of our Services. We use your information for the following objectives:

4.1 Verification of Your Identity

We use your personal information, including your official identity documents, to verify that you are indeed the person you claim to be. This verification is essential to prevent fraud, identity theft, money laundering, and to comply with our legal obligations regarding Know Your Customer (KYC) and Anti-Money Laundering (AML). Identity verification is mandatory before approval of any profit withdrawal (payout) from a Funded Account.

4.2 Provision and Maintenance of Our Services

We use your information to create, manage, and maintain your MILTRADERS account(s), give you access to our simulated trading platform, your personal dashboard, and all tools and features associated with our Services. This includes managing your monthly subscription (for Challenge and Pro evaluations), processing your payments, activating your Funded Account after passing the evaluation or purchasing an Instant account, and providing continuous and secure access to your account.

4.3 Delivery of Educational and Marketing Content

With your consent (where required by law), we use your email address and other contact details to send you educational content on futures trading, practical guides, market analyses, newsletters, announcements of new features, special promotions, commercial offers, and other marketing communications related to our Services. You can unsubscribe from these marketing communications at any time by following the unsubscribe instructions included in each message or by contacting us at privacy@miltraders.com.

4.4 Responding to Your Questions and Requests

We use your contact information to respond to your questions, process your customer support requests, resolve technical issues you might encounter, and provide personalized assistance regarding the use of our Services, program rules, payout procedures, or any other question you might have.

4.5 Sending Notifications and Transactional Communications

We use your information to send you important reminders, technical notices regarding the platform, updates to our policies or rules, security alerts (e.g., login from a new device or location), support and administrative messages, transaction confirmations (payments, payouts), and any other communication necessary for the proper functioning of your account.

4.6 Transaction Processing and Billing Management

We use your payment and billing information to process your monthly subscriptions, activation fee payments, Reset purchases, Instant account purchases, and to manage your billing. We also use this information to process your payout requests (profit withdrawal) from your Funded Account, verify your eligibility for payouts according to our

rules, calculate the exact amount to pay you (profit split, transfer fees), and execute transfers via Rise, Paymid, or any other payment service provider.

4.7 Detection, Investigation, and Prevention of Fraud and Abuse

We use your personal information, including your trading data, IP addresses, behavioral patterns, and any other relevant data, to detect, investigate, and prevent fraud, abuse of our Services, security issues, violations of Trading Rules set forth in our Agreements (Challenge Agreement and Funded Account Agreement), and breaches of contractual obligations. This specifically includes detection of: use of bots or automated trading systems (strictly prohibited), unauthorized copy trading between users, attempts at account manipulation or exploiting loopholes, suspicious VPN usage patterns suggesting account sharing or location spoofing, suspicious correlations between multiple accounts suggesting coordinated fraud, "gambling" type strategies (Martingale, Grid Trading, aggressive DCA), and any other prohibited or abusive practice set forth in our Agreements.

4.8 Compliance with Legal and Regulatory Obligations

We use and retain your personal information to comply with our legal and regulatory obligations, including but not limited to: international regulations on Anti-Money Laundering (AML) and Know Your Customer (KYC), tax and reporting obligations to competent authorities (United Arab Emirates, United States if applicable via IRS, European Union, etc.), legitimate requests from regulatory authorities, law enforcement, or courts, retention of documents for required legal durations (5 years for KYC/AML data), and compliance with applicable data protection laws (RGPD, CCPA, UAE laws).

4.9 Improvement of Our Services and User Experience

We analyze your Site and Services usage data to continually improve our features, user interface, dashboard, internal processes, and the overall experience we offer. This includes identifying bugs or technical issues, optimizing Site navigation, improving clarity of our communications, and developing new features meeting our users' needs.

4.10 Analytics, Advertising, and Remarketing

We use your information, in combination with third-party analytics tools (Google Analytics, Meta/Facebook Pixel, etc.), to conduct statistical analyses on the use of our Site, measure the effectiveness of our advertising campaigns, and perform remarketing (advertising retargeting) to visitors having shown interest in our Services but not yet subscribed. You have opt-out options for these activities, described in Article 7 of this Policy.

4.11 Non-Sale of Data Policy

MILTRADERS NEVER sells your personal information to third parties for commercial purposes, including under the definitions of "sale" or "sharing" set forth in CCPA/CPRA laws or any other applicable legislation. We do not monetize your personal data and only share it with third parties in strictly necessary cases described in Article 6 of this Policy.

ARTICLE 5: LEGAL BASIS FOR PROCESSING (RGPD)

If you are located in the European Union, the European Economic Area (EEA), the United Kingdom, or any other jurisdiction applying the RGPD or similar laws, we process your personal data based on the following legal grounds, in accordance with Article 6 of the RGPD:

5.1 Consent (Article 6(1)(a) RGPD)

We rely on your explicit consent when you: accept the use of non-essential cookies (analytics, advertising) via our cookie banner, sign up for our marketing communications (newsletters, promotions), voluntarily provide additional information not required for contract performance, or consent to the transfer of your data to the United Arab Emirates (third country outside EU). You may withdraw your consent at any time without affecting the lawfulness of processing carried out before withdrawal.

5.2 Performance of a Contract (Article 6(1)(b) RGPD)

We process your personal data when necessary to perform the contract you have entered into with us (Challenge Agreement, Pro Agreement, Instant Agreement, or Funded Account Agreement), notably to: create and manage your account, give you access to the Challenge, Pro evaluation, Instant Account, or Funded Account, process your payments (subscriptions, activation fees, instant purchases), process your payouts (profit withdrawals), provide you with customer support, and execute all our contractual obligations towards you.

5.3 Legal Obligation (Article 6(1)(c) RGPD)

We process your data when necessary to comply with our legal and regulatory obligations, notably: KYC/AML verification, document retention for 5 years (AML obligations), tax and regulatory filings, response to legitimate requests from competent authorities, and compliance with applicable data protection laws.

5.4 Legitimate Interests (Article 6(1)(f) RGPD)

We process certain data based on our legitimate interests, provided that your fundamental rights and freedoms do not override these interests. Our legitimate interests include: detection and prevention of fraud, abuse, and violations of our rules, security and integrity of our platform and Services, continuous improvement of our Services and user experience, conducting statistical analyses and research, defense of our legal rights in case of dispute, and communication of important information regarding our Services (excluding marketing). You have the right to object to any processing based on our legitimate interests by contacting privacy@miltraders.com.

ARTICLE 6: DISCLOSURE AND SHARING OF PERSONAL INFORMATION

MILTRADERS may disclose your personal information to certain affiliated and non-affiliated third parties that perform valuable services for us or on our behalf. When we share personal information with companies working on our behalf, we generally enter into a contractual agreement requiring them to maintain confidentiality and prohibiting unauthorized use or disclosure.

We may share your personal information in the following cases:

6.1 Technical and Operational Service Providers

A. Trading Platform and Market Data Providers

Volumetrica: Trading platform, simulated order execution, user interface.

dxFeed: Market data feed, real-time quotes.

Any other provider selected by MILTRADERS for trading infrastructure.

These providers have access to your trading data (history, orders, performance) to provide trading platform services.

B. Payment Processors

Rise: Processing payments for subscriptions, activation fees, Instant purchases, and Resets. Rise collects and processes your payment information in accordance with its own privacy policy.

Paymid: Processing alternative payments. Paymid processes your information in accordance with its own privacy policy.

Any other payment service provider selected by MILTRADERS.

MILTRADERS never stores full credit card numbers. Payment processors have access to your payment information only to the extent necessary to process transactions.

C. Payout Processors (Profit Withdrawals)

Rise (or any other payout processor used by MILTRADERS): Processing electronic payments and crypto payments (USDC) for payouts. These payout processors receive your banking details, name, and amounts to be paid, only to the extent necessary to execute transfers you have requested.

6.2 Analytics, Security, and Verification Services

A. Web Analytics Services

Google Analytics (Google LLC, United States): Analysis of traffic on our Site, user behavior, aggregated demographic data. User-level and event-level data collected via Google Analytics are retained by Google for 26 months, after which they are automatically deleted. Aggregated statistical reports may be retained indefinitely. Opt-out: <https://tools.google.com/dlpage/gaoptout>

B. Identity Verification Services (KYC)

We may use specialized third-party services for identity verification to validate the authenticity of your KYC documents, detect fraudulent documents, and verify that you do not appear on international sanctions lists or Politically Exposed Persons (PEP) lists.

C. Fraud Detection Services

We may share certain data (IP addresses, trading patterns, connection data) with fraud detection services to identify suspicious behaviors, unauthorized access attempts, or violations of our rules.

6.3 Advertising and Remarketing

We share certain information with third-party advertising platforms to serve targeted ads and measure the effectiveness of our marketing campaigns: Meta/Facebook (Meta Platforms, Inc.), Google Ads (Google LLC), Twitter/X Ads (if used), AdRoll or other remarketing platforms (if used). These providers may use cookies or similar technologies. You can opt out via: Google Ads Settings (adssettings.google.com), Facebook Ad Preferences (facebook.com/ads/preferences), or YourAdChoices (aboutads.info/choices).

6.4 Legal Compliance and Protection of Our Rights

We may disclose your personal information if we believe in good faith that such disclosure is necessary or appropriate to: comply with legal or regulatory requirements (including responding to subpoenas, court orders, or requests from authorities), protect the rights, property, or personal safety of MILTRADERS, our users, or the general public, or enforce our contractual rights in case of dispute.

6.5 With Your Consent

In all other cases not covered above, we will share your personal information with third parties only with your explicit prior consent.

6.6 Limitation on Use of Sensitive Information

In accordance with CPRA regulations, we do not use or disclose sensitive personal information for purposes other than those authorized by CPRA §7027(m) regulations, i.e., solely to provide requested Services, prevent fraud and ensure security, and comply with our legal obligations.

ARTICLE 7: INTERNATIONAL DATA TRANSFERS

7.1 Transfer to the United Arab Emirates

MILTRADERS is a company based in the United Arab Emirates (UAE). When you provide us with your personal information, your data will be transferred, processed, and stored in the United Arab Emirates. Data protection laws of the UAE may not offer the same level of protection as laws of your country of origin, particularly if you reside in the European Union. The UAE does not benefit from an adequacy decision by the European Commission under Article 45 of the RGPD.

7.2 Legal Basis for International Transfers

A. Necessity for Performance of Contract

We must process certain personal data in the UAE to provide you with the Services you requested (account creation, trading access, payments, payouts, support). Without this transfer, we would not be able to provide our Services.

B. Your Explicit Consent

For transfers not strictly necessary for contract performance (e.g., marketing analyses), we rely on your explicit consent. You may withdraw consent at any time by contacting privacy@miltraders.com, although this may limit your ability to use certain Services.

7.3 Appropriate Safeguards

MILTRADERS takes appropriate measures to protect your personal information: encryption of sensitive data (SSL/TLS for transmissions, encryption at rest for storage), strict access controls, contractual agreements with all subcontractors requiring confidentiality and security, regular security audits, and continuous staff training on data protection.

7.4 Other Possible International Transfers

Your data may also be transferred to: United States (if we use US-based services such as Google Analytics or other cloud tools), United Kingdom (for certain providers), or other countries depending on technical providers. In all cases, we ensure appropriate guarantees are in place to protect your data in accordance with RGPD requirements.

ARTICLE 8: DATA RETENTION

8.1 General Retention Duration

We retain your personal information as long as reasonably necessary to fulfill the purposes for which we collected it, including providing Services, complying with legal, accounting, and tax obligations, enforcing agreements, and resolving disputes.

8.2 Specific Retention Periods

A. Non-Transactional Communications: Maximum three (3) years from date of communication.

B. Transactional or Financial Records: Maximum seven (7) years from date of transaction or account closure (payment confirmations, invoices, payout requests, KYC documents, signed contracts).

C. KYC Documents and AML Data: Minimum five (5) years after account closure or last transaction, as required by international AML/KYC regulations, UAE laws, and FATF recommendations.

D. Account Registration Details: Up to ten (10) years after account closure (name, email, date of birth, IP addresses, subscription history). This extended retention allows prevention of fraud and fraudulent re-registration, response to law enforcement requests, enforcement of platform rules (banning), and maintenance of security blacklists.

E. Other Account Information: Retained only as long as necessary to provide Services, resolve disputes, or comply with applicable law, after which it is securely deleted or anonymized.

8.3 Anonymization and Aggregation

We may anonymize or aggregate your data such that it can no longer be associated with you personally. We may retain this anonymized or aggregated data indefinitely for statistical analysis, research, and internal reporting purposes, without this constituting processing of personal data.

8.4 Variations in Retention Periods

Actual retention periods may vary depending on operational or technical considerations, nature of data, or changes in applicable legal or regulatory requirements. We regularly review our retention policies to ensure consistency with industry best practices and legal obligations.

ARTICLE 9: USE OF COOKIES AND TRACKING TECHNOLOGIES

9.1 What is a Cookie?

A cookie is a small text file placed on your device when you visit a website. Cookies allow the website to recognize your device and store certain information regarding your preferences or past actions.

9.2 Our Use of Cookies

We use cookies to authenticate users, keep sessions active, track Site performance, and measure effectiveness of our marketing efforts. Types of cookies:

- **A. Essential Cookies (Strictly Necessary):** Required for basic operation. Cannot be disabled.
- **B. Performance and Analytics Cookies:** Collect anonymous usage data. Can be disabled.
- **C. Functionality Cookies:** Remember your preferences. Can be disabled.
- **D. Targeting and Advertising Cookies:** Allow personalized advertisements. Can be disabled.

9.3 Managing Your Cookie Preferences

You can control or delete cookies via: (A) Cookie Banner on first visit, (B) Your Browser Settings (visit www.allaboutcookies.org for instructions), (C) Opt-Out Tools: Google Analytics (tools.google.com/dlpage/gaoptout), Interest-based advertising (aboutads.info/choices or youonlinechoices.eu). Disabling certain cookies may impact functionality.

9.4 Legal Basis for Use of Cookies (RGPD)

For EU/UK residents: Consent for non-essential cookies, Legitimate interest for strictly necessary cookies. You may withdraw consent at any time. For more information, please consult our complete Cookie Policy.

ARTICLE 10: THIRD-PARTY ANALYTICS AND ADVERTISING SERVICES

10.1 Google Analytics

We use Google Analytics (Google LLC, United States) to understand how users interact with our Site. Data collected includes: pages visited, time spent, device and browser information, general geographical location, and user interactions. Data Retention: 26 months from last interaction, then automatically deleted. Opt-out: tools.google.com/dlpage/gaoptout.

10.2 Other Third-Party Analytics Services

We may use additional third-party analytics services. For information on specific providers, please contact support@miltraders.com.

10.3 Advertising and Remarketing

We use third-party providers (Google Ads, Meta/Facebook Ads, Twitter/X Ads, AdRoll, etc.) for targeted advertising and remarketing. Opt-out: Google Ads Settings (adssettings.google.com), Facebook Ad Preferences (facebook.com/ads/preferences), YourAdChoices (aboutads.info/choices).

ARTICLE 11: YOUR RIGHTS UNDER NATIONAL OR INTERNATIONAL LAWS

If you are a resident of certain States or countries offering additional rights, or if you reside in the EU/EEA/UK, you may benefit from the following rights:

11.1 Right of Access

You can request a copy of personal data we hold about you, as well as information on how we use it, categories processed, recipients, and retention period.

11.2 Right to Rectification

You can ask us to correct or update your personal data if it is inaccurate, incomplete, or outdated. You can also update certain information directly from your dashboard.

11.3 Right to Erasure ("Right to be Forgotten")

You can ask us to delete your personal data in certain circumstances. This right is subject to our Data Retention Policy (Article 8) and our legal retention obligations (notably 5 years for KYC/AML data).

11.4 Right to Restriction of Processing

You can ask us to temporarily suspend processing of your personal data in certain cases (verification of rectification, unlawful processing, establishment of legal claims, pending objection verification).

11.5 Right to Data Portability

You can ask us to provide your personal data in a structured, commonly used, machine-readable format (CSV, JSON, PDF) for transfer to another service provider.

11.6 Right to Object

You can object to: direct marketing (unsubscribe at any time), processing based on legitimate interest, and profiling for marketing purposes. We will cease processing unless we have compelling legitimate grounds.

11.7 Right to Withdraw Consent

Where we rely on your consent, you can withdraw it at any time. Withdrawal does not affect lawfulness of prior processing but may limit your ability to use certain Services.

11.8 Right to File a Complaint

You have the right to file a complaint with your local data protection authority. EU: France — CNIL (www.cnil.fr), other EU countries — contact your national authority. US: Contact your State Attorney General.

11.9 Exercising Your Rights

To exercise any of these rights, please send an email to: privacy@miltraders.com. We may ask you to verify your identity before processing your request. We will respond within one (1) month, extendable by two (2) additional months for complex requests.

11.10 Absence of Representative in EU

MILTRADERS does not currently maintain a representative in the European Union pursuant to Article 27 of RGPD. However, we are committed to respecting RGPD principles and handling all requests from EU residents appropriately.

ARTICLE 12: DELETION REQUESTS AND LEGAL RETENTION OBLIGATIONS

If you reside in a jurisdiction granting you the right to deletion (RGPD, CCPA/CPRA), you may request deletion at any time by contacting privacy@miltraders.com. We may retain certain information as required by law for: completing pending transactions, detecting and preventing fraud, maintaining commercial or tax records (5-7 years), complying with regulatory obligations, and exercising or defending legal claims. Once retention is no longer necessary, data will be securely deleted or anonymized.

ARTICLE 13: HOW DO WE PROTECT YOUR INFORMATION?

13.1 Technical and Organizational Security Measures

We implement and maintain reasonable and appropriate security measures to protect your personal information:

- **A. Transmission Security:** SSL/TLS encryption for all data transmissions between your browser and our servers.
- **B. Storage Security:** Encryption at rest for sensitive data, strict access controls (logged and audited), strong authentication for administrative systems.
- **C. Backups and Data Integrity:** Regular backups, integrity checks.
- **D. Two-Factor Authentication (2FA):** Strongly recommended for user accounts, mandatory for administrator accounts.
- **E. Ongoing Staff Training:** All employees and subcontractors receive training on data security and RGD compliance.
- **F. Monitoring and Anomaly Detection:** Continuous monitoring, intrusion detection systems, automated threat blocking.

13.2 Security Limitations

No method of transmission over the Internet or electronic storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security. You acknowledge that MILTRADERS cannot be held responsible for unauthorized access or data loss resulting from circumstances beyond our control.

13.3 Your Responsibility

You are responsible for the security of your account by: choosing a strong unique password, never sharing credentials, enabling 2FA if available, logging out after each session, and immediately informing us of any suspicious activity.

ARTICLE 14: DATA BREACHES

In case of a data breach, we will notify you in accordance with applicable laws: EU/EEA residents within 72 hours (RGPD), US residents per State law, other jurisdictions per local law. The notification will include the nature of the breach, categories of data concerned, probable consequences, measures taken, and measures you can take. We will also notify competent regulatory authorities as required by law.

ARTICLE 15: MODIFICATIONS TO THIS POLICY

We may update this Privacy Policy from time to time. We will update the "Last Updated" date at the top of this page. For material changes, we will provide prior notice (email, Site notice, or dashboard notification). Any modification becomes effective upon publication on our Site. Your continued use after the effective date constitutes acceptance. If you do not accept, you must stop using our Services and close your account. No refund will be granted.

ARTICLE 16: CONTACT US

Field	Details
Company	MILTRADERS LLC-FZ
Address	Meydan Free Zone, Dubai, United Arab Emirates
Privacy Contact	privacy@miltraders.com
General Support	support@miltraders.com
Website	www.miltraders.com

We are committed to responding to all data protection requests within one (1) month from receipt, in accordance with RGD requirements.

ARTICLE 17: FINAL PROVISIONS

17.1 Language: In case of translation, the English version shall prevail.

17.2 Severability: If a provision is held invalid, the other provisions remain fully in force.

17.3 Integration with Other Documents: This Privacy Policy should be read in conjunction with: MILTRADERS Challenge Agreement, MILTRADERS Funded Account Agreement, Risk Disclosure Statement, Cookie Policy, and Terms of Use. In case of conflict, the User Agreements prevail.

Effective Date: March 1st, 2026

Last Updated: March 1st, 2026

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