

PRIVACY POLICY

This Privacy Policy explains how we collect, use, store, disclose, and protect your personal data when you use our services.

It covers:

- Who controls your data
- What we collect and how
- How we use it
- How we store and secure it
- Who we share it with
- International transfers
- Your rights

1. CONTROLLER & CONTACT

The controller of your personal data is:

OGM International Ltd

Ground Floor, The Sotheby Building, Rodney Village,
Rodney Bay, Gros-Islet, Saint Lucia

Contact: support@orionfunded.com

2. WHAT DATA WE COLLECT & HOW WE GET IT

Directly from you:

- Identification/contact details (name, phone, email, address, DOB, etc.)
- Account data (username, password)

- Payment details (when relevant)
- Communications with our support team

Automatically:

- Device data (IP, device type, OS, browser)
- Website usage (timestamps, geolocation at country level, pages visited)
- Service usage (logins, settings, evaluation parameters, simulated trading activity)

From third parties (if you connect them):

- Simulated trading data (instruments, timestamps, P/L)
- Social network data (username, email, profile picture)

Each third-party provider applies its own privacy policy.

3. HOW WE USE YOUR DATA

Account registration & access

To create and manage your account.

Legal basis: contract.

Providing and operating our services

To run evaluations, enable simulated trading, and support your activity.

Legal basis: contract + legitimate interest (protecting operations).

Marketing

Service-related marketing under legitimate interest; broader marketing only with your consent.

You can unsubscribe anytime.

Customer support

To answer questions and maintain service quality.

Service improvement & security

To analyse usage, test features, secure systems, and improve user experience.

Analytics

To understand performance and user behaviour in aggregated form.

4. STORAGE & SECURITY

Your data sits in encrypted systems protected with access controls, monitoring, and regular audits. Only authorised personnel and vetted processors can access it.

5. RETENTION

We keep your data only as long as required for each purpose or by law:

- Contract-related data: up to 10 years after termination
- Marketing (legitimate interest): up to 5 years or until you object
- Service-improvement data: up to 6 months
- Legal obligations: typically 5–10 years depending on jurisdiction
- Consent-based data: until consent is withdrawn

After that, data is deleted or anonymised.

6. DATA SHARING & INTERNATIONAL TRANSFERS

We share data only with essential partners, such as:

- Trading platform providers
- Hosting/cloud providers
- Payment processors
- Customer support tools
- IT/security vendors

- Marketing/communication agencies
- Consultants or postal/courier services
- Group companies (where applicable)

All operate under confidentiality and data-protection commitments.

Some partners are outside Saint Lucia or your home country. Transfers are protected using contractual safeguards or equivalent mechanisms.

Some external platforms act as independent controllers (e.g., trading platforms, social networks). Their policies apply separately.

7. YOUR RIGHTS

Contact support@orionfunded.com to exercise any of these:

- **Access:** know whether we process your data and obtain a copy.
- **Rectification:** correct inaccurate or incomplete data.
- **Erasure:** request deletion in specific cases (e.g., no longer needed, consent withdrawn). We may retain data where legally required.
- **Restriction:** request limited processing in certain scenarios.
- **Portability:** receive your data in machine-readable format or request transfer.
- **Object:** oppose legitimate-interest processing, including marketing. Marketing stops immediately upon objection.
- **Withdraw consent:** applies going forward.
- **No automated decisions:** request not to be subject to automated decisions with significant impact.

8. FINAL PROVISIONS

We may update this Policy as needed. The latest version will always be available on our website or in your Client Area. Updates take effect upon publication unless stated otherwise.