

Explore our Privacy Policy

Effective Date: 29.04.2026

At SabioTrade, we are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you access or use our website, platform, and services.

For the purposes of this Privacy Policy, “personal data” means any information relating to an identified or identifiable natural person. While this Policy reflects principles of widely recognized data protection frameworks (including, where applicable, the General Data Protection Regulation (EU) 2016/679 (“GDPR”)), it is designed to comply with applicable United States federal and state privacy laws, including consumer protection and data privacy requirements.

It is important that you read this Privacy Policy together with any other privacy notice or disclosure we may provide on specific occasions when we collect or process your personal data, so that you are fully aware of how and why we use your data.

In this Privacy Policy, unless the context otherwise requires, capitalized terms shall have the meanings assigned to them in the Terms & Conditions. This Privacy Policy applies to both Users and prospective Users of our services.

1. WHO WE ARE

SabioTrade is a global brand operated by **CODEVIL ENGINEERING LIMITED**, a company registered in Ireland with its registered address at 2C, Grangegorman Lower, Smithfield, Dublin 7, Dublin D07A433, Ireland (hereinafter referred to as “we”, “us”, “our”, “Company”, or “SabioTrade”).

For the purposes of applicable data protection laws, we act as the **data controller** in relation to the personal data you provide when registering for an account, accessing our platform, or purchasing our services.

SabioTrade operates a **software-based educational and evaluation platform** that provides users with access to simulated trading environments and related services. The Company does not provide brokerage services, does not execute trades on behalf of users, and does not hold or manage user funds for trading purposes.

We are committed to protecting your personal data and maintaining transparency in how it is handled. All entities within the SabioTrade group implement appropriate technical, administrative, and organizational measures designed to safeguard personal data against unauthorized access, loss, misuse, or alteration.

We maintain internal data protection policies and procedures, which are reviewed and updated periodically based on risk assessments and evolving regulatory requirements. These measures are designed to ensure the confidentiality, integrity, and availability of your personal data.

We do not disclose your personal data to third parties except:

- where necessary for the provision of our services,
- where required by applicable law or legal process,
- where necessary to enforce our contractual rights, or
- where you have provided your consent.

Your personal data may be processed by authorized employees, affiliates, and carefully selected service providers who support the operation of our platform. All such processing is carried out in accordance with applicable legal requirements and subject to appropriate safeguards.

This Privacy Policy may be supplemented by additional notices or terms applicable to specific services or interactions with us.

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or legal obligations. Any updates will be published on our website and will take effect upon posting.

If you have any questions, comments, or requests regarding this Privacy Policy or our data practices, you may contact us using the details provided in the section “**Our Contact Details**”.

2. DATA USAGE

We may collect, use, store, and transfer different categories of personal data about you, which we group as follows:

- **Identity Data** includes first name, last name, date of birth, and identification information such as passport, national ID, or driver’s license details.
- **Contact Data** includes billing address, email address, and telephone numbers.
- **Financial Data** includes payment-related information such as billing details and limited payment instrument data necessary to process transactions.
- **Transaction Data** includes details about your purchases of services, account activity, and interactions with our platform. For clarity, this does not include any real trading activity, as all activity on the platform is simulated.
- **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting, location, operating system, and other technology on the devices you use to access our website, including cookies and similar tracking technologies.

- **Profile Data** includes your account details, username and password, service usage history, preferences, feedback, and responses to surveys.
- **Usage Data** includes information about how you use our website and services, including registration details, account status, support interactions, and IP history.
- **Marketing and Communication Data** includes your preferences in receiving marketing communications from us and your communication settings.
- **Payment Data** includes limited information related to your payment methods (such as payment provider, masked card details, or wallet identifiers) required to process transactions securely.
- **KYC Data (Know Your Customer)** includes identity verification information such as copies of identification documents (e.g., passport, ID card, driver's license) and proof of address (e.g., utility bills), where required for compliance purposes.
- **Location Data** includes general geographic information inferred from your IP address or device settings, such as country of residence, time zone, and language preferences.

(collectively referred to as "**Personal Data**")

We may also collect, use, and share **Aggregated Data**, such as statistical or demographic data, for analytical and business purposes. Aggregated Data does not directly identify you. However, if Aggregated Data is combined with Personal Data in a way that could identify you, we will treat it as Personal Data in accordance with this Privacy Policy.

We process Personal Data in accordance with applicable data protection principles, including lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality, and accountability.

In general, SabioTrade collects and processes Personal Data for the following purposes:

- **To provide and operate our services**, including access to our simulated trading platform, educational content, and evaluation programs;
 - **To perform our contractual obligations** with you;
 - **To comply with applicable legal and regulatory requirements**, including identity verification, fraud prevention, and consumer protection obligations;
 - **To protect our legitimate business interests**, including maintaining platform security, improving our services, enforcing our Terms & Conditions, and preventing misuse of the platform.
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The User acknowledges that certain data related to their account, platform activity, and service usage may be retained by SabioTrade and may be used in connection with disputes, investigations, or enforcement of our Terms & Conditions.

Consistent with our business model, all platform activity data relates to **simulated trading and platform usage**, and does not represent real financial transactions or brokerage activity.

The User is responsible for ensuring that the Personal Data provided to us is accurate and up to date. You must notify us of any changes to your information.

While we take reasonable steps to maintain accurate records, we rely on the information provided by you and cannot guarantee that all data will always be complete or current without your cooperation. SabioTrade shall not be held responsible for any inaccuracies resulting from a failure by the User to update their Personal Data.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect personal data from and about you, including the following:

Direct Interactions

You may provide us with your Identity, Contact, and Payment Data directly when interacting with our website or services, including when you:

- Register for an account;
- Purchase or access our services;
- Subscribe to receive updates or communications (unless you opt out);
- Request marketing communications;
- Participate in surveys, promotions, or campaigns;
- Contact us or provide feedback.

We collect this data in order to:

- Provide access to our platform and services;
- Perform our contractual obligations;
- Maintain account security and prevent fraud or misuse;
- Comply with applicable legal and regulatory requirements, including identity verification and consumer protection obligations.

If you do not provide certain required data, we may not be able to provide you with access to our services or fulfill our contractual obligations. In such cases, we may be required to suspend or terminate access to the services, and we will inform you accordingly.

You are responsible for ensuring that the information you provide is accurate and up to date.

Automated Technologies or Interactions

When you access or use our website or platform, certain technical data is collected automatically from your device.

This may include:

- IP address;
- Device and browser type;
- Operating system;
- Time zone and general location;
- Access times and pages viewed;
- Interaction patterns within the platform.

We use this information to:

- Ensure the proper functioning, security, and performance of our platform;
- Improve usability and user experience;
- Monitor and analyze usage trends;
- Detect and prevent fraudulent or unauthorized activity.

We may use cookies and similar technologies, as well as third-party analytics tools, to better understand how users interact with our services and to optimize our website and marketing efforts.

You may control or limit certain automated data collection (such as cookies) through your browser settings. However, disabling such technologies may affect the availability or functionality of certain features of the platform.

Where required by applicable law, we will obtain your consent before using non-essential cookies or similar technologies.

Social Media and Third-Party Integrations

If you choose to interact with us through social media platforms or use any social media integration features, we may collect information associated with your social media account, such as:

- Username or profile name;
- Public profile information;
- Any data you choose to share with us through such platforms.

This information is collected in accordance with the privacy settings of the relevant platform and your choices.

Cookies

Our website uses cookies and similar technologies to enhance your experience and improve our services.

Cookies are small data files stored on your device that allow us to recognize your device and remember certain information about your preferences or interactions.

We use cookies to:

- Enable core website functionality;
- Improve performance and user experience;
- Analyze usage and traffic patterns;
- Support marketing and advertising activities (where permitted).

You can manage or disable cookies through your browser settings. Please note that disabling cookies may limit your ability to use certain features of our website.

For more information about how we use cookies, please refer to our Cookie Policy (if applicable).

Your Choices

You may contact us at any time to request limitations on certain types of data processing, subject to applicable legal and contractual restrictions.

We will review and respond to such requests in accordance with applicable laws.

4. PURPOSE FOR WHICH WE WILL USE YOUR DATA AND ON WHAT LEGAL BASIS

1. We process your Personal Data in accordance with applicable data protection and consumer protection laws in order to:
 - Provide access to and operate our platform, including our simulated trading environment, educational content, and evaluation services;
 - Perform our contractual obligations toward you;
 - Ensure the proper functioning, security, and integrity of our systems;
 - Comply with applicable legal and regulatory requirements, including identity verification, fraud prevention, and enforcement of our Terms & Conditions;
 - Protect our legitimate business interests, including improving our services, preventing misuse, and resolving disputes.

For clarity, all services provided by SabioTrade relate to a **simulated environment and educational platform**, and do not involve real trading activity, brokerage services, or investment services.

2. We process Personal Data based on one or more of the following legal grounds, as applicable:
 - **Performance of a contract** — where processing is necessary to provide you with access to our services;
 - **Compliance with legal obligations** — where processing is required under applicable laws or regulations;
 - **Legitimate interests** — where processing is necessary for our business operations, provided that such interests are not overridden by your rights and freedoms;
 - **Consent** — where you have provided your explicit consent, particularly for certain marketing communications or optional data processing activities.
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3. Depending on the specific purpose, we may rely on more than one legal basis for processing your Personal Data.
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4. Communications and Marketing

If you are an existing User, or if you have provided your consent where required, we may use your Personal Data to:

- Communicate with you regarding your account, support requests, or service-related updates;
- Inform you about new features, improvements, or changes to our services;
- Send you newsletters, promotional materials, or other marketing communications that may be relevant to you.

You may opt out of marketing communications at any time by following the unsubscribe instructions included in such communications or by contacting us directly.

All marketing communications will be presented in a manner that accurately reflects the nature of our services and will not misrepresent simulated performance as real financial results.

5. Children's Data

Our website and services are not intended for individuals under the age of 18, and we do not knowingly collect Personal Data from minors.

We may request your date of birth as part of the registration process in order to verify that you meet the minimum age requirement.

If we become aware that we have collected personal data from an individual under the age of 18, we will take steps to delete such data.

5. OPTING OUT

You have the right to control how your Personal Data is used for marketing and communications.

If you no longer wish to receive newsletters, promotional messages, or other marketing communications from us, you may:

- Use the unsubscribe link included in our communications; or
- Contact us at **support@sabiotrade.com** using your registered email address and request to opt out.

We will process your request within a reasonable timeframe, in accordance with applicable laws.

Please note that even if you opt out of marketing communications, we may still contact you with **service-related or administrative communications**, including messages related to your account, transactions, or changes to our services.

Where applicable, we do not sell your Personal Data to third parties for monetary consideration. We also do not share your Personal Data with third parties for their own independent marketing purposes without your consent.

6. DISCLOSURE OF DATA

We may share your Personal Data with third parties only where necessary for the purposes described in this Privacy Policy.

We require all third parties who process Personal Data on our behalf to:

- Process such data only for specified purposes and in accordance with our instructions;
 - Implement appropriate security measures to protect the data;
 - Comply with applicable data protection and privacy laws.
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Categories of Recipients

We may share your Personal Data with the following categories of recipients:

A. Service Providers

We engage trusted third-party service providers to support the operation of our platform and services. These may include providers of:

- IT infrastructure and hosting services;
- Payment processing and billing services;
- Analytics, performance monitoring, and security tools;
- Customer support and communication tools;
- Marketing and communication services (where permitted).

These providers act as **data processors** and are contractually restricted from using your Personal Data for their own purposes.

B. Affiliates and Group Companies

We may share Personal Data with affiliated entities within the SabioTrade group for internal administrative purposes, support functions, and service delivery, subject to appropriate safeguards.

C. Legal and Regulatory Authorities

We may disclose Personal Data to governmental, regulatory, law enforcement, or judicial authorities where:

- Required by applicable law or legal process;
- Necessary to comply with regulatory obligations;
- Necessary to protect our rights, users, or the public.

Such disclosures will be limited to what is strictly necessary.

D. Business Transfers

Your Personal Data may be transferred to a third party in connection with a corporate transaction, such as a merger, acquisition, restructuring, or sale of assets. In such cases, appropriate safeguards will be implemented to protect your data.

E. Legal Claims and Protection of Rights

We may disclose Personal Data where necessary to:

- Enforce our Terms & Conditions;
 - Investigate or prevent fraud, abuse, or unauthorized activity;
 - Protect our legal rights, property, or safety, or that of our users or others;
 - Establish, exercise, or defend legal claims.
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International Transfers

Your Personal Data may be transferred to and processed in countries outside your jurisdiction, including jurisdictions that may not provide the same level of data protection as your home country.

Where such transfers occur, we implement appropriate safeguards, which may include:

- Contractual data protection clauses;
- Data processing agreements with service providers;
- Compliance with applicable legal frameworks governing international data transfers.

By using our services, you acknowledge that your data may be transferred and processed in jurisdictions outside your country of residence, where permitted by applicable law.

A transfer to an affiliate and/or related company and/or third party based in a Third Country would only take place where one of the following applies:

- The individual has given consent to the transfer of information.
 - The transfer is necessary for the performance of a contract between the individual and the Company, or the implementation of pre-contractual measures taken in response to the individual's request.
 - The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the SabioTrade group company and a third party.
 - The transfer is necessary or legally required on important public interest grounds or for the establishment, exercise, or defense of legal claims.
 - The transfer is required by law.
 - The transfer is necessary in order to protect the vital interests of the individual.
 - The transfer is made under a data transfer agreement.
 - The transfer is otherwise legitimized by applicable law.
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7. DATA RETENTION

We retain your Personal Data only for as long as reasonably necessary to fulfill the purposes for which it was collected, including to:

- Provide and maintain our services;
- Comply with applicable legal, regulatory, tax, and accounting requirements;
- Resolve disputes and enforce our agreements;
- Prevent fraud, abuse, or misuse of our platform.

We may retain your Personal Data for a longer period where necessary in the event of a complaint, investigation, or where we reasonably believe there is a possibility of legal claims arising from our relationship with you.

To determine the appropriate retention period, we consider factors such as:

- The nature, sensitivity, and volume of the data;
- The potential risk of harm from unauthorized use or disclosure;
- The purposes for which the data is processed;
- Applicable legal, regulatory, and operational requirements.

Where required by applicable laws or regulatory obligations, we may retain certain categories of Personal Data for extended periods. For example, identity verification and transaction-related records may be retained for a period typically ranging from **five (5) to seven (7) years**, depending on legal and compliance requirements.

For other categories of data that are not subject to mandatory retention requirements, we retain such data only for as long as necessary to support the operation of our services and then securely delete or anonymize it.

When Personal Data is no longer required, we take reasonable steps to ensure that it is:

- Securely deleted; or
- Irreversibly anonymized, so that it can no longer be associated with an identifiable individual.

Where feasible, we also require our service providers to delete or anonymize Personal Data in accordance with our instructions and applicable contractual obligations.

8. YOUR RIGHTS AND HOW TO WITHDRAW CONSENT AND UNSUBSCRIBE

We ask that you provide accurate, complete, and up-to-date information when using our services and that you do not misrepresent your identity. You are responsible for promptly notifying us of any changes to your personal information.

Your Privacy Rights

Depending on your location and applicable laws (including certain U.S. state privacy laws), you may have rights regarding your Personal Data. These rights may include:

- The right to know what Personal Data we collect and how we use it;
- The right to access Personal Data we hold about you;
- The right to request correction of inaccurate or incomplete Personal Data;
- The right to request deletion of your Personal Data, subject to applicable legal exceptions;
- The right to request restriction or limitation of certain processing activities;
- The right to object to certain types of processing, including marketing communications;
- The right to withdraw consent, where processing is based on your consent.

Please note that these rights are **not absolute** and may be limited by applicable legal, regulatory, or contractual obligations.

Exercising Your Rights

If you wish to exercise any of your rights or request more information, you may contact us using the contact details provided in the section “**Our Contact Details**”, using your registered email address.

To protect your data, we may request additional information to verify your identity before processing your request. This is a security measure to prevent unauthorized access to Personal Data.

Response Time

We will respond to your request within a reasonable timeframe, as required by applicable law. In some cases, we may require additional time to process complex requests, in which case we will inform you accordingly.

Withdrawal of Consent and Marketing Preferences

Where processing is based on your consent, you may withdraw that consent at any time. This includes opting out of marketing communications.

You may:

- Use the unsubscribe link included in marketing emails; or
- Contact us directly to update your communication preferences.

Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.

Important Limitations

Please note that we may retain and continue to process certain Personal Data where necessary to:

- Comply with legal or regulatory obligations;
 - Complete transactions or fulfill contractual obligations;
 - Detect and prevent fraud or misuse;
 - Establish, exercise, or defend legal claims.
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9. DATA SECURITY

We implement reasonable and appropriate technical, administrative, and organizational security measures designed to protect your Personal Data from unauthorized access, loss, misuse, alteration, or disclosure.

Access to Personal Data is restricted to employees, contractors, and service providers who have a legitimate business need to access such data in order to perform their duties. All such individuals are subject to confidentiality obligations and are required to process Personal Data only in accordance with our instructions.

We maintain procedures designed to detect, respond to, and mitigate potential data security incidents. Where required by applicable law, we will notify affected individuals and relevant authorities in the event of a data breach.

Your Responsibility

You play an important role in keeping your Personal Data secure.

When registering for an account, you are required to create login credentials (such as a username and password). You are responsible for maintaining the confidentiality of your login information and for all activities that occur under your account.

You should not share your login credentials with any third party. We are not responsible for any unauthorized access resulting from your failure to safeguard your credentials.

If you suspect any unauthorized access to your account, you must notify us immediately using the contact details provided in the section “**Our Contact Details.**”

Technical Safeguards

We use industry-standard security measures designed to protect Personal Data during transmission and storage. These measures may include:

- Encryption of data in transit using secure protocols;
- Access controls and authentication mechanisms;
- Network security controls and system monitoring;
- Segmentation of systems and restriction of access based on business need.

We also design our systems and services with security considerations in mind and continuously review and improve our security practices.

Data Minimization and Protection

Where appropriate, we apply techniques such as data minimization and limited use of identifiers to reduce the exposure of Personal Data within our systems.

Important Disclaimer

While we take reasonable steps to protect your Personal Data, no system or method of transmission over the Internet is completely secure. Therefore, we cannot guarantee absolute security of your data.

10. OUR CONTACT DETAILS

If you have any questions about this Privacy Policy or our data practices, you may contact us using the details below:

Controller:

CODEVIL ENGINEERING LIMITED
2C, Grangegorman Lower, Smithfield
Dublin 7, Dublin D07A433
Ireland

Email: support@sabiobtrade.com

We will make reasonable efforts to respond to your inquiries in a timely manner, in accordance with applicable laws.

11. LINKS TO OTHER WEBSITES

Our website may contain links to third-party websites, services, or applications that are not owned or controlled by us.

We are not responsible for the privacy practices, content, or security of such third-party websites. Any interaction with those websites is governed by their respective terms and privacy policies.

We encourage you to review the privacy policies of any third-party websites before providing any personal data.

12. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be updated from time to time to reflect changes in our practices, services, or legal obligations.

When we make updates, we will revise the “Effective Date” at the top of this Privacy Policy. The updated version will be posted on our website and will become effective upon publication, unless otherwise required by applicable law.

Where required by applicable law, we may provide additional notice of material changes.

This Privacy Policy may be supplemented by additional notices, disclosures, or terms provided in connection with specific services or interactions.

If you have any questions or feedback regarding this Privacy Policy, you may contact us using the details provided in the section “**Our Contact Details.**”
