

PRIVACY POLICY

Last Updated: February 17, 2026

1. INTRODUCTION

This Privacy Policy ("Policy") explains how **PairTrading.Pro** ("we," "us," or "our") collects, uses, and protects your information when you use our website **pairtradingpro.com** and our downloadable desktop software (collectively, the "Service").

We respect your privacy and are committed to protecting your personal data. By downloading, installing, or using the Service, you agree to the collection and use of information in accordance with this Policy.

1.2. Data Controller

For the purposes of the General Data Protection Regulation (GDPR), the data controller is the operator of **PairTrading.Pro**.

- **Contact:** support@pairtrading.pro
- **Jurisdiction:** As defined in our Terms of Service (England and Wales).

2. INFORMATION WE COLLECT

We collect minimal information necessary to provide the Service.

2.1. Account Information

- **Registration Data:** When you create an account, we collect your **email address**, **username**, and **password** (cryptographically hashed).
- **Support Data:** If you contact us, we collect your name and message content.

2.2. Financial Data (Crypto Only & Non-Custodial)

⚠ IMPORTANT: We operate on a strictly **non-custodial** basis.

- **API Keys & Credentials:** We **DO NOT** collect, store, transmit, or have access to your Exchange API Keys or trading terminal logins/passwords (e.g., for MetaTrader). They are encrypted and stored locally on your device.
- **Payment Information:** We accept cryptocurrency payments only. We **do not** collect credit card data. All payments are processed by secure blockchain networks (e.g., TRC-20, ERC-20). We only store a **transaction hash (TXID)** and payment status to verify your license.
- **Zero-Knowledge of Trading Activity:** We operate on a "Zero-Knowledge" basis regarding your financial performance. We **DO NOT** collect or store data regarding your **Account Balances, Portfolio History, Trade Executions, or Proprietary Strategies**. Your financial success and trading logs remain exclusively on your device.

2.3. Technical Usage Data (Website & Software)

- **Log Data:** IP address, browser type, OS, and timestamps.
- **Device Fingerprint (HWID):** We generate a unique hardware identifier based on your device's hardware configuration. This identifier is **cryptographically hashed** before transmission and cannot be used to identify specific hardware components or reverse-engineer your system specs. It is used **solely** to bind your license key to your device.
- **Crash Reports:** In the event of a software crash, a dialog box may appear requesting permission to send an anonymous report. **Sending this data is entirely voluntary and occurs only if you explicitly confirm the action.** It contains stack traces but never contains API keys or personal data.

2.4. Aggregated Usage & Performance Metrics

We may collect **technical telemetry regarding runtime environment and operational parameters.** This data enables us to analyze performance bottlenecks and optimize the Software's stability across diverse hardware configurations in future updates.

- **Anonymization:** This data is strictly anonymous and stripped of all personal identifiers. It allows us to monitor global usage trends and general software health without tracking specific user activities.

EXCLUSIONS (Data We Never Transmit):

For the avoidance of doubt, this usage data **strictly excludes** your private financial and strategic information:

- **Account Balances:** We do not see your wallet balances, equity, or margin levels.
- **Trade History:** We do not transmit logs of your executed trades, PnL (Profit and Loss), or transaction history.
- **Trading Strategies:** We do not harvest your specific algorithmic logic, proprietary parameters, or signal generation rules.
- **Personal Identity:** Usage telemetry is not linked to your real name or personal identity.

2.5. Do Not Track

Our Service does not currently respond to "Do Not Track" (DNT) signals, but we do not track your browsing activities across third-party websites.

3. LEGAL BASIS FOR PROCESSING (GDPR)

If you are in the European Economic Area (EEA), we process your data based on the following grounds:

Data Type	Legal Basis	Why we need it
Account Data	Contract Performance	To provide access to the Service.

Data Type	Legal Basis	Why we need it
HWID / License	Legitimate Interest	To prevent fraud and unauthorized sharing.
Payment TXID	Legal Obligation	For tax and accounting records.
Crash Reports	Consent	To fix bugs (you trigger the send action).
Analytics/Marketing	Consent	You can opt-out at any time.

4. DATA RETENTION

We retain your personal data only as long as necessary:

Data Type	Retention Period
Active Account	Indefinitely (until you delete it).
Deleted Account	Erased within 90 days of deletion request.
Payment Records	7 years (required by tax/AML laws).
Server Logs	90 days (rolling basis).
Crash Reports	12 months (for debugging).

5. DATA SHARING AND DISCLOSURE

We **NEVER** sell your personal data or trading strategies. We share data only with trusted vendors bound by strict Data Processing Agreements (DPAs):

- **Infrastructure:** Cloud hosting providers (for encrypted data storage and processing).
- **Security:** Cloudflare (for DDoS protection and CDN services).
- **Analytics:** We use **Google Analytics** to understand how users interact with our Website. Google Analytics uses cookies to collect usage data.
 - You can learn more about how Google uses data here: policies.google.com/technologies/partner-sites.
 - You can opt-out of Google Analytics across all websites by installing this browser add-on: tools.google.com/dlpage/gaoptout.
- **Legal Compliance:** If required by a valid court order or subpoena.

6. DATA SECURITY

- **Encryption:** We use SSL/TLS for all network communications.
- **Hashing:** Passwords are salted and hashed using industry standards (e.g., bcrypt/Argon2).

- **Client-Side Security:** Your API keys never leave your device. You are responsible for securing your own computer against malware.

7. DATA PRIVACY & TELEMETRY

7.1. Local Storage (Non-Custodial). You acknowledge that your Exchange API Keys (Public and Secret) and Trading Terminal Credentials (such as MetaTrader terminal logins, passwords, and server details) are encrypted and stored **solely on your local device**. The Licensor never transmits, monitors, or stores your private API credentials or terminal access data on its servers.

7.2. Anonymous Telemetry. To improve Software stability and optimize performance, the Software may periodically transmit **anonymous technical telemetry** regarding **internal configuration states** and **workflow usage patterns**. This data is strictly de-identified and is aggregated to help us understand feature utilization.

7.3. EXCLUDED DATA (What We DO NOT Collect).

For the avoidance of doubt, and notwithstanding Section 7.2, the Licensor **strictly DOES NOT collect, monitor, store, or have access to:**

- **Account Balances:** We do not see your wallet balances, equity, or margin levels.
- **Trade History:** We do not transmit logs of your executed trades, PnL (Profit and Loss), or transaction history.
- **Trading Strategies:** We do not harvest your specific algorithmic logic, script parameters, or signal generation rules.
- **Personal Identity:** Usage telemetry is not linked to your real name or personal identity.

8. INTERNATIONAL TRANSFERS

Your information may be transferred to servers located outside your jurisdiction (including outside the EEA).

- **Safeguards:** When transferring data, we rely on **Standard Contractual Clauses (SCCs)** approved by the European Commission or equivalent adequacy decisions to ensure your data remains protected.
- **Consent:** By using the Service, you consent to this transfer.

9. CHILDREN'S PRIVACY

Our Service is not intended for individuals under 18. We do not knowingly collect data from children.

10. CHANGES TO THIS POLICY

We may update this Policy. We will notify you of significant changes by updating the "Last Updated" date above.

11. CONTACT US

If you have questions about this Privacy Policy, please contact:

- **Email:** support@pairtrading.pro