

Privacy Policy

Take Funded Ltd. — how we collect, use, share and protect personal data

Controller	Take Funded Ltd., company number 2026-00594
Registered office	Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia
Contact for privacy	support@takefunded.com
Version	Draft 0.2 — 26 August 2026 (supersedes Draft 0.1 of 19 August 2026)

INTERNAL DRAFTING NOTE — REMOVE BEFORE PUBLICATION. Draft 0.2 supersedes Draft 0.1 of 19 August 2026. The reference to the consistency rule has been removed from section 3 and the automated-decision section updated for the in-house risk engine. Three items must still be settled before publication. (1) The hosting location of the platform and back office is marked below and must be confirmed with the vendor. (2) No representative in the European Union has been appointed; this policy therefore contains no such section, which a reviewer familiar with Article 27 GDPR will notice. (3) Section 9 addresses automated decision-making — automated breach detection produces significant effects for clients, and the right to human review described there must actually be operable by the support team.

1. Who we are and what this covers

1.1 Take Funded Ltd. decides why and how personal data is processed in connection with the evaluation service, and is therefore the controller of that data.

1.2 This policy covers our website, the client area, the trading platforms we make available and our support and community channels. It does not cover websites of third parties that we link to.

1.3 Questions, requests and complaints about personal data should be sent to support@takefunded.com and are handled within one month of receipt.

2. What we collect

Category	Examples
Identity data	Name, date of birth, nationality, country of residence, identity document details and images
Verification data	Proof of address, liveness selfie and the facial comparison performed against your document, verification result and audit trail
Contact data	E-mail address, Discord account, telephone number where provided
Declaration data	Country of business, country of tax payment, declaration regarding convictions for financial crime
Transaction data	Purchases, add-ons, refunds, Reward requests and payments. Card and bank details are entered directly with our payment providers and are not stored by us
Trading data	Orders, positions, stop-loss levels, balances, drawdown, rule evaluations, breach records and account status
Technical data	IP address, device and browser identifiers, connection logs, API session records, cookie identifiers

Category	Examples
Communications	Support tickets, e-mail correspondence, messages in our community channels
Consent records	Acceptance of terms with version, timestamp and IP; cookie choices; marketing consents

2.1 The liveness selfie and the facial comparison performed during enhanced verification involve biometric processing for the purpose of uniquely identifying you. We carry this out on the basis of your explicit consent, given before verification begins. If you do not wish to provide it, we cannot complete verification and cannot pay a Reward.

3. Why we process it, and on what basis

Purpose	Legal basis	Notes
Creating and operating your profile and accounts; providing the evaluation service; processing purchases, refunds and Rewards	Performance of a contract	Without this data the service cannot be provided
Identity verification, sanctions screening, age verification, record keeping	Legal obligation; explicit consent for biometric elements	Anti-money-laundering and sanctions requirements
Enforcing the trading rules: risk limits, position limits, the stop-loss requirement, the news window, minimum intervals between trades	Performance of a contract	Rule evaluation is automated — see section 9
Detecting prohibited practices: cross-account hedging, copy trading, multiple profiles, abnormal API or IP patterns	Legitimate interests	Our interest in preventing fraud and protecting the integrity of the evaluation
Support, complaint handling and dispute resolution	Performance of a contract; legitimate interests	
Website analytics	Consent	Only where you accept analytics cookies
Publishing results using your nickname	Legitimate interests	You may object at any time
Publishing your full name, photograph or video	Consent	Separate, specific and withdrawable
Security, logging, backup and abuse prevention	Legitimate interests	
Establishing, exercising or defending legal claims	Legitimate interests; legal obligation	

4. Who we share it with

4.1 We share personal data with the following categories of recipient, each acting under a written data processing agreement and only for the purposes described above.

Recipient	Role	What and why
Trading platform providers	Processor	Account creation and trading data for the simulated environment
Back-office and client-area vendor	Processor	Profile management, rule evaluation, payout workflow
Identity verification provider	Processor	Document checks, liveness and name matching. Data is stored on infrastructure located in the European Economic Area
E-mail delivery provider (Mailgun, EU region)	Processor	Transactional e-mail — verification, credentials, breach and payout notifications
Payment providers	Independent controller	Collecting fees and paying Rewards. They process card and account details under their own privacy policies
Google Ireland Limited	Processor	Website analytics, only with your consent
Discord	Independent controller	Community and notification channel, under Discord's own privacy policy
Hosting and infrastructure providers	Processor	Location to be confirmed with the platform vendor
Professional advisers, auditors, authorities	Varies	Where required by law or to defend legal claims

TO CONFIRM BEFORE PUBLICATION — the identity verification provider must be named once the choice between Sumsb and Veriff is made, together with the country in which it is established. The hosting location must be confirmed with the platform vendor.

4.2 We do not sell personal data and we do not share it with third parties for their own marketing.

5. International transfers

5.1 We are established in Saint Lucia, and some of our processors operate outside the European Economic Area. Transfers of data from the EEA are made under the European Commission's Standard Contractual Clauses, together with technical measures such as encryption in transit and at rest, or under another lawful transfer mechanism.

5.2 A copy of the relevant transfer safeguards can be requested at the address in clause 1.3.

6. How long we keep it

Data	Retention
Identity and verification data, transaction records	Five years after the relationship ends, as required by anti-money-laundering rules
Profile and account data, trading history	Five years after the account is closed

Data	Retention
Support correspondence	Three years from the last message, or longer where a dispute is open
Consent records	For as long as the consent is relied on, and five years afterwards as evidence
Analytics data	As set out in the Cookie Policy
Data relevant to a legal claim	Until the claim and any appeal period are finally concluded

6.1 Our verification provider applies its own, shorter retention period to the documents it holds. Where we are required to retain verification records for longer, we hold our own copy for the periods above.

7. Security

7.1 We apply access controls on a need-to-know basis, encryption in transit and at rest, logging of administrative access, segregation of production data, and vetting of the processors we appoint.

7.2 No system is perfectly secure. If a breach affecting your data occurs and is likely to result in a high risk to you, we will inform you and the relevant authority as required.

8. Your rights

8.1 Depending on where you live, you may have the right to: obtain a copy of your data; correct inaccurate data; request deletion; restrict or object to processing, including processing based on our legitimate interests; receive your data in a portable format; and withdraw a consent at any time without affecting processing already carried out.

8.2 Deletion has limits. We must keep identity and transaction records for five years under anti-money-laundering rules and cannot delete them earlier. Where a deletion request covers such data, we delete everything outside that requirement and remove the remainder once the period expires. We will always tell you which data we are keeping and why.

8.3 A profile can be closed in the client area only after all accounts held under it are closed. Closing a profile is not the same as deleting your data; a deletion request can be made at any time and is handled under clause 8.2.

8.4 Requests are made to support@takefunded.com and answered within one month. We may ask you to verify your identity before acting, to make sure we are not disclosing your data to someone else.

8.5 If you are in the European Economic Area or the United Kingdom you may lodge a complaint with the data protection authority of your country. We would prefer the chance to resolve the matter first.

9. Automated decisions

9.1 Rule compliance on your accounts is evaluated automatically and continuously. Automated systems determine whether a loss limit or a risk limit has been exceeded, whether the number of open positions is within the permitted maximum, whether a stop loss was attached within the required window, whether a trade fell inside a news window or below the minimum interval between trades, and whether a pattern of activity indicates a prohibited practice.

9.2 These evaluations can result in positions being closed automatically, in individual trades being voided, and in an account being closed, and can mean that no Reward is paid.

9.3 Screening for sanctions and for multiple profiles is likewise carried out with automated support.

9.4 You have the right to ask for a decision of this kind to be reviewed by a person, to express your point of view and to contest the outcome. A request is made through support and is examined by a member of staff who has access to the underlying trading records and to the data on which the automated evaluation was based.

10. Children

10.1 The service is for adults only. We do not knowingly process the data of anyone under 18, and any profile found to belong to a minor is closed and its data deleted, except where a record must be retained by law.

11. Changes

11.1 This policy is updated when our processing changes. The current version and its date are published in the client area, and material changes are notified to you in accordance with the Terms and Conditions.

Take Funded Ltd., company number 2026-00594, Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia. Draft 0.2 dated 26 August 2026 — prepared for internal review, not for publication. Read together with the Terms and Conditions, the Risk Disclaimer and the Cookie Policy.