

APPENDIX B: ERA TRADE PRIVACY POLICY

Version 2.0 | Effective Date: January 30, 2026

This Policy forms an integral part of the Era Trade Service Terms of Use.

1. Data Controller

The controller of your personal data is OsOO "Bold Fund" (Kyrgyz Republic, Bishkek, Suyumbayeva Street, 16).

2. Categories and Purposes of Data Processing

Data Category	Examples	Purpose of Processing	Legal Basis
Identification	Name, date of birth, passport series/number (KYC)	Contract performance (KYC), AML law compliance	Contract performance, legitimate interest, legal compliance
Contact	Email, phone	Communication, notifications, support, marketing (with consent)	Contract performance, consent
Financial	Payment history, payout data (wallet address)	Payment processing, reward payout	Contract performance
Account Data	Login, password hash, trading history, login IP addresses	Access provision, security, fraud prevention	Contract performance, legitimate interest
Technical	IP, browser type, cookie data	Analytics, security, service improvement	Legitimate interest

3. Data Sharing

We may share data with:

- **Subprocessors:** Cloud hosting providers, analytics services (Google Analytics), KYC providers, support services.
- **Government Authorities:** Upon lawful request for compliance with KR legislation.

- **Successor:** In case of merger or sale of assets. All third parties are obliged to maintain confidentiality and ensure an adequate level of protection.

4. International Transfers

Data may be processed outside Kyrgyzstan. We ensure protection through standard contractual clauses or other mechanisms recognized by the EU and other jurisdictions.

5. Data Retention Periods:

- Account and transaction data: **5 years** after account closure (tax and AML legislation requirements).
- KYC data: **5 years** after the last transaction.
- Marketing data: Until consent is withdrawn.

6. Your Rights

You have the right to access, correct, delete, restrict processing, data portability, and withdraw consent. To exercise your rights, send a request to support@eratrade.io.

7. Changes

We will notify you of significant changes via email or the Site.

APPENDIX C: ERA TRADE RESPONSIBLE TRADING POLICY

Version 1.0 | Effective Date: January 30, 2026

This Policy defines Era Trade's philosophy and expectations regarding the approach to trading and forms part of the Terms of Use.

1. Our Mission

We strive to identify and develop traders who demonstrate **discipline, resilience, and professional risk management**. Our platform is not a casino but a tool for honing skills.

2. Foundational Principles of a Successful Trader

- **Risk Over Profit:** No potential profit is worth breaching risk limits. Always use stop-losses.
- **Trading Plan is Your Law:** Enter a trade with a clear plan for entry, exit (take-profit and stop-loss), and position management.
- **Position Size is Key to Survival:** Risk per trade should not exceed 1-2% of virtual capital. Avoid overtrading and excessive leverage.
- **Emotions Are Your Main Adversary:** Fear and greed are the most common causes of failure. Trade by a system, not on impulse.

3. What We Consider "Toxic" Behavior (And Why It Harms You)

Prohibited practices from **Appendix A** not only lead to blocking but also foster harmful habits:

- **News Trading** teaches reliance on luck, not analysis.
- **Using Arbitrage Schemes** creates a false sense of a "risk-free" strategy that doesn't work with real capital.
- **Manipulation and Exploitation of Errors** have nothing to do with genuine market mastery.

4. Our Role in Your Development

- We may initiate **check-up interviews (risk interviews)** to understand the logic of your trades and ensure the absence of Prohibited Practices.
- We reserve the right to provide **general educational feedback** based on observed trading patterns, or to temporarily restrict trading on accounts showing signs of clearly irresponsible behavior (e.g., a series of large loss-making trades without a visible strategy). **Such feedback shall under no circumstances be construed as an investment or trading recommendation.**

5. The Purpose of This Policy

We want every success on our platform to be a step towards your long-term success as a trader. Adherence to these principles is the only path to building a stable career and a trusting relationship with Era Trade.