CMC FUNDED

Privacy Policy

Version 2.3 | Effective 5 November 2026

How True North Tech L.L.C-FZ, trading as CMC Markets Funded, collects, uses, shares and protects personal data, including platform and simulated trading data.

Operator	True North Tech L.L.C-FZ
Trading name	CMC Markets Funded
Company type	Free Zone Limited Liability Company
Registry	Meydan Free Zone, Dubai, United Arab Emirates
Registration number	2646504
Business licence number	2646504.01
Registered office	Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, U.A.E.
CMC Markets relationship	True North Tech L.L.C-FZ operates CMC Markets Funded independently, in conjunction with CMC Markets, under a written commercial agreement. No CMC Markets company operates, sells or guarantees the Services.
Version	2.3
Effective date	5 November 2026

Legal counterparty: True North Tech L.L.C-FZ, trading as CMC Markets Funded.

In short

- True North Tech L.L.C-FZ decides how your personal data is used. We are the controller.
- We use your data to run your account and challenges, take payments, check identity when required, pay Rewards, support you, keep the Programme fair and, if you agree, measure our advertising.
- We use named providers to do this. Section 8 lists them and where they process data.
- Optional cookies stay off until you accept them. You can change your choice at any time through "Privacy Settings" in the website footer.
- You can ask to see, correct or delete your data, or object to how we use it, by emailing support@cmcmarketsfunded.com.

1. Who we are

In this Policy, "we", "us" and "our" mean True North Tech L.L.C-FZ, trading as CMC Markets Funded, a Free Zone Limited Liability Company formed in the Meydan Free Zone, Dubai, United Arab Emirates. Our registered office is shown at the top of this Policy.

True North Tech L.L.C-FZ is the controller of your personal data. This means we decide why and how it is used, and we are responsible for it.

2. Who this Policy covers

This Policy applies when you:

- visit our Website (cmcmarketsfunded.com), the Client Area (client.cmcmarketsfunded.com) or the trading platform we provide;
- create an account, place an order or buy a challenge;
- take part in an evaluation or the Reward Stage;
- connect a trading tool, copy-trading service, AI assistant or API token to your trading account;
- contact us through chat, email, forms or social media;
- complete identity, sanctions, anti-fraud or payout checks;
- ask for a Reward or a refund; or
- apply to or take part in our affiliate programme or Partner portal (partner.cmcmarketsfunded.com).

If you joined through a sponsoring partner, such as Verichain, the privacy notice for that partner's programme may also apply to you.

This Policy does not cover other websites or apps once you leave ours, including any site or app run by a CMC Markets company, a payment provider, the trading platform provider, an AI assistant provider or any other third party. Their own privacy notices apply.

3. The personal data we collect

What we hold depends on how you use the Services.

Type	Examples
Identity and account	Name, date of birth, username, account and trading login IDs, nationality, and records of what you accepted and when. If you trade through a company: company details and its authorised users.
Contact	Email address, phone number, country, city, language and communication preferences.
Identity verification	Identity documents, proof of address, tax or residency details and, where required, source of funds or wealth. Our checks may compare a selfie or short video with your identity document to confirm that you are the person shown (biometric data).
Payment	Billing details, transaction references, payment method type and fraud-screening results. Card numbers are entered on our payment provider's page; we do not store them. If you ask for a Reward, the payment details you give us to receive it.
Device and technical	IP address, browser and device type, operating system, cookie identifiers, sign-in and security events, approximate location from your IP address, and pages visited.
Simulated trading and Programme	Account settings, orders, trades, instruments, balance and equity, drawdown, rule checks, risk flags, challenge status, payout history and review outcomes.
Market data status	Whether you are a Private Investor (a non-professional user of market data) or a professional user, the date and source of any change, including the email in which you asked to be reclassified, and the related audit record.

Type	Examples
Trading tools	Whether orders came through the platform's Trader API, its MCP server, an Expert Advisor, a bot or a copy-trading feature, with the related technical records the platform gives us. If you choose to give them to us, for example to answer a review under the Payout Policy, details of any trader or signal service you copy, or of the people who copy you. We do not ask for, and do not want, your API token.
Support and communications	Chat and email messages, tickets, complaints, survey answers, conversations with our AI support assistant and notes made while helping you.
Compliance and risk	Sanctions and politically exposed person screening results, crypto wallet screening, chargeback history, links between devices or accounts, and anti-abuse markers. This can include information about fraud, sanctions or offences.
Marketing and advertising	Your email preferences, which emails you opened or clicked, the campaign, website or affiliate that referred you and, if you accept marketing cookies, the advertising identifiers described in our Cookie Policy.
Affiliates and partners	If you are an affiliate or partner: your name, contact and payment details held by impact.com, your Partner portal sign-in email and your referral performance.

4. Where your data comes from

- You, when you sign up, buy, trade, verify your identity or contact us.
- The trading platform provider, Match-Trader, which runs your trading account and sends us your trading records.
- Payment providers, which tell us whether a payment succeeded and screen it for fraud.
- Our identity verification provider, which tells us the result of your checks.
- Affiliates and impact.com, which tell us that an affiliate referred you.
- Sponsoring partners, such as Verichain, which send us the details of candidates they sponsor.
- Advertising platforms, which tell us how our adverts performed, mostly in aggregate.

5. How we use your data

We use personal data to:

- create and run your account and give you the Services you asked for;
- process purchases, payments, refunds and Reward requests;
- provide and secure the Website, the Client Area and access to the trading platform;
- apply the Programme Rules, including to trades placed by tools, copy trading or AI assistants, and detect prohibited practices;
- carry out identity, sanctions, anti-money laundering and anti-fraud checks when required;
- contact you about your account, orders, support requests, legal notices and platform events;
- answer you through our support team and our AI support assistant;
- understand how the Website is used and fix problems;
- measure our advertising, using advertising cookies and conversion data only if you accept them;
- email you about our challenges and offers, as described in section 14;
- record your market data status, report market data use by month to those who license it to us, and keep an audit record of that use (section 9.4);
- analyse simulated trading data for risk management, product improvement and our own trading decisions, as described in section 6;

- pay affiliates and partners for referrals; and
- meet legal, tax, accounting, sanctions and record-keeping duties.

6. Simulated trading data, our own trading and automated checks

Because CMC Markets Funded is a simulated evaluation, much of what we process is simulated trading data, together with the device and account data needed to keep the Programme fair.

Monitoring. We check trading with rule-based software, platform records and AI-assisted analysis. These checks can calculate limits, block an order that would break a rule, apply a disclosed loss limit, hold a payment for review or open a review. They apply in the same way to trades placed by you, a trading tool, a copy-trading feature or an AI assistant.

A person makes the final decision. A trained reviewer must look at the evidence before we finally refuse, reduce or recover a Reward, reject a disputed pass refund or close an account for alleged abuse. The reviewer can disagree with the system. You can ask for an explanation and challenge the decision, as the Payout Policy describes.

Our own trading. As the General Terms and Conditions explain, we may analyse your simulated trades and may copy some of them into accounts owned or controlled by us or our Affiliates (General Terms 6.8). An Affiliate is a company that controls True North Tech L.L.C-FZ, is controlled by it, or is under common control with it; no CMC Markets company is our Affiliate. You have no right to know whether we did so and no share in any result.

Aggregated data. We may combine or anonymise data so that it no longer identifies you, and use it for statistics, product development, reporting, fraud prevention and risk models, including after your account closes.

7. Our legal bases

Where a privacy law requires a legal basis, we rely on the following.

Basis	Used for
Contract	Running your account and challenges, payments, refunds, Rewards, support, platform access, applying the Programme Rules and recording your market data status.
Legal obligation	Identity, sanctions, anti-money laundering, tax, accounting and record-keeping duties, and requests from authorities.
Legitimate interests	Reporting market data use to those who license it to us and keeping an audit record of that use, fraud and abuse prevention, security, service improvement, cookieless page measurement, our own trading analysis, emails about similar products to customers, and handling disputes. We balance these interests against your rights, and you can object (section 15).
Consent	Optional cookies for analytics, advertising, affiliate tracking and chat, sending purchase data to advertising platforms, and passing your details to CMC Markets when you tick a sponsoring partner's "Stay informed with CMC Markets" box (section 9.2). You can withdraw consent at any time; this does not affect what happened before.
Legal claims	Establishing, exercising or defending legal claims.

Biometric data. Identity checks may compare a selfie or video with your identity document. Where this uses biometric data to identify you, we rely on your explicit consent, given in the verification flow, or on another condition the law allows, such as preventing fraud or meeting a legal obligation.

Information about fraud, sanctions or offences. We use this information only where the law authorises it, for fraud prevention, sanctions screening and legal compliance.

8. Who we share your data with

We share personal data only where needed for the purposes above. The providers below process data on our behalf under contract unless we say otherwise.

Provider	What it does for us	Where it processes data
Amazon Web Services	Hosts our Website, Client Area, Partner portal and main systems; sign-in for the Client Area and Partner portal; security firewall	United Kingdom (London); backup copies in Ireland; website firewall logs in the United States
Match-Trader	Trading platform, trading accounts and platform CRM	Varies by service; see section 10
Paymaxis, and the payment providers it routes payments through	Card and crypto payments, fraud screening and refunds	Varies by service; see section 10
Sumsub	Identity verification, including selfie and liveness checks, when required	Varies by service; see section 10
Customer.io (sending through Mailgun)	Account and marketing emails	United States
Intercom, including its Fin AI agent	Support chat and email, and AI-assisted support answers	United States
Google (Analytics 4, Tag Manager, Google Ads)	Website analytics, loading our tags, and advertising measurement only with your consent	Varies by service; see section 10
Meta (Facebook and Instagram)	Advertising measurement through the Meta pixel in your browser and the Conversions API from our servers, only with your consent. Our Meta advertising account sits in a Meta business account held by CMC Markets UK Plc (section 9.2)	Varies by service; see section 10
TikTok	Advertising measurement through the TikTok pixel, only with your consent	Varies by service; see section 10
impact.com	Affiliate tracking and affiliate payments; tracking cookies only with your consent	Varies by service; see section 10
Usercentrics	Asking for, recording and applying your cookie choices	European Union
Stape	Delivers our Google Tag Manager script from a cmcmarketsfunded.com address	European Union, multi-region
Elementor Site Mailer	Website emails such as password resets	Varies by service; see section 10
Hostinger	Email mailboxes, and servers for our support tools and internal desks	Germany; Malaysia
Trustpilot, YouTube, Google Fonts	Reviews, embedded videos and fonts on some pages, only with your consent for Functional cookies	Varies by service; see section 10
AI service providers	Help our team analyse support conversations and operational data, under contract	Varies by service; see section 10

We also share personal data with:

- sponsoring partners, such as Verichain, if they sponsored your evaluation, limited to the results and status that partner's programme describes;
- CMC Markets, if you ticked a sponsoring partner's "Stay informed with CMC Markets" box, so that it can respond to your request and keep you informed (section 9.2);
- advertising platforms, as above, only if you accept their cookies. With your consent, Meta receives purchase events from our servers, including your email address in hashed (scrambled) form and your browser identifiers, so it can match them to an advert;
- impact.com and affiliates: when an affiliate referred you, impact.com receives the order reference, the items bought, their value and the affiliate's click identifier. The affiliate sees the sale, not your name or contact details;
- professional advisers such as lawyers, accountants, auditors and insurers;
- regulators, tax authorities, law enforcement, courts and other authorities where the law requires it; and
- a buyer, investor or successor if our business is reorganised, financed or sold, under confidentiality.

We update this list when our providers change.

9. CMC Markets

9.1 True North Tech L.L.C-FZ operates CMC Markets Funded independently, in conjunction with CMC Markets. No CMC Markets company owns or controls True North Tech L.L.C-FZ.

9.2 Except as section 9.4 describes, or where you ask us to, we do not share your personal data with any CMC Markets company for its own purposes. If you joined through a sponsoring partner and ticked its "Stay informed with CMC Markets" box, your request and the contact details, location and trading experience needed to respond to it are passed, by that partner or by us where we hold them, to the CMC Markets company named in the privacy notice linked beside the box, so that it can respond and keep you informed. That company then handles them under its own privacy notice, and you can opt out at any time. CMC Markets UK Plc gives us marketing support under our commercial agreement (General Terms 2.11), and our Meta advertising account and pixel sit in a Meta business account held by CMC Markets UK Plc.

9.3 If you open an account or use a service with a CMC Markets company yourself, that company handles your data under its own privacy notice. It is not responsible for our Services, Rewards, refunds or support.

9.4 **Market data.** The prices and charts in the Services come from market data licensed to us by CMC Markets or by third-party market data providers. Their licences require us to count and report how that data is used. We treat every customer as a Private Investor unless they ask, by email to support@cmcmarketsfunded.com, to be classified as a professional user. We will update your classification and confirm it to you. Each month we report the number of Private Investors and professional users to CMC Markets and, where they require it, to the providers whose data we use. These reports normally contain totals, not your name. If a provider or CMC Markets audits our use of market data, we may need to show them the classification record for individual customers, including yours.

10. International transfers

Your data is processed in the United Arab Emirates, where we are based, and in the countries shown in section 8, including the United Kingdom (our main hosting), Ireland, Germany, the United States and Malaysia, and in other countries where our providers operate.

Where the law requires safeguards for these transfers, we rely on an adequacy decision or use the contractual safeguards the law provides, such as the UK International Data Transfer Agreement or Addendum, or the EU Standard Contractual Clauses. You can ask us for a copy.

11. How long we keep your data

We keep personal data only for as long as we need it for the purposes in this Policy, including legal, tax, accounting, fraud, sanctions and dispute requirements. When we no longer need it, we delete it or anonymise it.

Data	How long
Account, order, payment and Reward records	While you hold an account, then for as long as tax, accounting and other record-keeping laws require, and for as long as a claim could be brought.
Market data status and audit record	While you hold an account, then for as long as our market data licences and audit duties require.
Identity verification records	For as long as anti-money laundering, sanctions and fraud-prevention laws require after the check or after your account closes.
Support conversations	While your account is open and for as long as afterwards as we need them to deal with complaints, disputes or claims.
Website security (firewall) logs, including IP address	30 days
Google Analytics event data	2 months; user-level data 14 months
Cookies	As listed in our Cookie Policy
Marketing email preferences	While we email you. If you unsubscribe, we keep a record of that for as long as we need it to make sure we do not email you again.
Backups	Overwritten or deleted on a rolling basis. Data deleted from our live systems is removed from backups when they are replaced.

Anonymised data that no longer identifies you may be kept longer.

12. Security

We protect personal data with technical, organisational and contractual measures, including role-based access, encryption in storage and in transit, logging, monitoring, provider checks and incident response.

No system is completely secure. Keep your password, API tokens, devices and email account secure. Never share your login or API token with anyone, including people offering to trade, copy or pass a challenge for you. We will never ask for your password or API token.

Anything done using your login or API token is treated as done by you. This does not apply to activity after you have told us that your login or token may have been compromised, or to activity caused by a failure of our own systems or security. If you think your login or token has been exposed, change your password or revoke the token straight away and tell us at support@cmcmarketsfunded.com.

When you connect an AI assistant, trading tool or copy-trading service to your trading account, that provider receives your account data under its own terms and privacy notice, not ours.

13. Cookies

We use cookies and similar technologies for security, sessions, your cookie choice, chat, analytics, advertising and affiliate tracking. Optional cookies stay off until you accept them. Before you choose, and if you decline, Google Analytics still receives a cookieless page signal, as our Cookie Policy explains.

We use Usercentrics to ask for, record and apply your choices. You can change them at any time through "Privacy Settings" in the website footer. Full details, including the cookies we found on our site and how long they last, are in our Cookie Policy.

14. Marketing emails

We send service messages you need about your account, purchases, support, security, legal notices, Programme updates and payouts. You cannot opt out of these while you hold an account.

If you buy from us, or start a purchase and do not finish it, we may email you about similar challenges and offers without asking first. Every marketing email has an unsubscribe link, and you can also tell us using the details in section 17. We do not send marketing emails to anyone who has told us not to.

15. Your rights

Depending on where you live and the law that applies, you may have the right to:

- get a copy of your personal data;
- correct it;
- delete it;
- restrict or object to how we use it, including for direct marketing, which you can always stop;
- receive it in a portable format;
- withdraw consent; and
- complain to a data protection authority where you live or work.

To use a right, email support@cmcmarketsfunded.com. We may need to confirm your identity first. We reply within one month, which the law allows us to extend in some cases. If we need longer, we tell you why. We may limit a request where the law allows, for example where we must keep records or where it would affect someone else's rights.

16. Children

Our Services are not for children. You must meet the minimum age and eligibility requirements in our General Terms and Conditions.

17. Changes and contact

We may update this Policy when the law, our Services, our providers or our business change. We will change the date at the top and, where the change matters to you, tell you directly.

To ask about this Policy or use a privacy right, email support@cmcmarketsfunded.com or write to True North Tech L.L.C-FZ at the registered office shown at the top of this Policy. Please give your full name, the email address you use with us and what you are asking for.