



GDPR Statement

Describing Signal Codex's approach to data protection, privacy, and compliance with the General Data Protection Regulation (GDPR).

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01. Purpose of this Statement

This GDPR Statement describes Signal Codex's approach to the protection of personal data and compliance with applicable data protection laws, including the **General Data Protection Regulation (EU) 2016/679** ("GDPR").

This document is intended to provide brokerage partners, prospective customers, and authorized users with a high-level overview of Signal Codex's privacy and data protection practices.

At a glance

Signal Codex operates without access to client accounts, balances, transaction history, or KYC documentation — making GDPR compliance a structural property of the platform, not an add-on.

02. Commitment to Data Protection

Signal Codex recognizes the importance of protecting personal data and maintaining appropriate technical and organizational safeguards.

Signal Codex is committed to:

- processing personal data lawfully, fairly, and transparently;
- limiting data collection to what is necessary for the provision of Services;
- implementing appropriate security controls;
- protecting personal data against unauthorized access, disclosure, alteration, or loss;
- supporting customers in meeting applicable data protection obligations.

03. Data Processing Role

Depending on the context of processing, Signal Codex may act as either:

- a **Data Processor** on behalf of brokerage partners; or
- a **Data Controller** in relation to its own business operations, website inquiries, demo requests, and customer communications.

Where brokerage partners provide access to Signal Codex through authentication systems or user management functions, the brokerage partner generally acts as the Data Controller and Signal Codex acts as the Data Processor.

04. Categories of Personal Data Processed

Signal Codex processes limited categories of personal data necessary for operation of the Services.

User Account Information

- Full Name;
- Email Address;
- Username;
- Role or Permission Level;
- Organization Affiliation.

Authentication Information

- Broker-Generated User Identifier;
- Login Records;
- Session Information.

Technical Information

- IP Address;
- Activity Logs;
- Security Logs;
- Access Records.

Business Communication Information

- Demo Requests;
- Customer Communications;
- Support Requests.

Signal Codex does not require or intentionally process:

- payment card information;
- trading balances;
- transaction history;
- deposit information;
- withdrawal information;
- KYC documentation;
- government-issued identification documents;
- financial statements.

05. Data Minimization Principles

Signal Codex applies data minimization principles and seeks to collect only information reasonably necessary to provide, maintain, support, and secure the Services.

By design

The platform has been designed to operate **without access to customer trading balances, transaction history, payment information, or KYC records.**

06. Security Measures

Signal Codex implements technical and organizational safeguards appropriate to the nature of the Services and associated risks.

Security measures may include:

- encrypted communications;
- authentication controls;
- role-based access management;
- activity logging;
- infrastructure monitoring;
- network protection technologies;
- security controls provided by infrastructure and hosting providers.

Security measures are reviewed and updated as appropriate.

07. Data Subject Rights

Where applicable under GDPR and other data protection laws, individuals may have rights including:

- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to withdraw consent where consent is the legal basis for processing.

Requests relating to personal data may be submitted using the contact information published on the Signal Codex website.

08. Data Retention

Signal Codex retains personal data only for as long as reasonably necessary to provide the Services and fulfill legitimate business purposes.

Following termination of access or expiration of services:

- access rights may be revoked immediately;
- information may be retained for up to **thirty (30) days** for security, auditing, operational, dispute resolution, and compliance purposes;
- information may subsequently be deleted or anonymized.

Certain information may be retained for longer periods where required by applicable law.

09. International Data Transfers

Signal Codex may process or store information in jurisdictions different from those of its customers or users.

Where required by applicable law, Signal Codex implements appropriate safeguards for international transfers of personal data.

Such safeguards may include contractual commitments, adequacy mechanisms, or other lawful transfer mechanisms.

10. Sub-Processors

Signal Codex may engage trusted service providers to support operation of the Services.

Current categories of service providers include:

- cloud hosting providers;
- infrastructure and security providers;
- communication and email delivery providers.

Examples may include:

Service Provider	Purpose
Hetzner	Infrastructure and hosting
Cloudflare	Network security and content delivery
Resend	Email delivery and communications

Signal Codex requires such providers to maintain appropriate confidentiality and security standards.

11. Supporting Documentation

Signal Codex maintains supporting documentation relevant to data protection and privacy, including:

- Privacy Policy;
- Data Processing Agreement (DPA);
- Terms of Service;
- Risk Disclaimer.

Additional information may be provided to customers upon reasonable request.

12. Contact

Questions regarding this GDPR Statement may be directed to the contact information published on the Signal Codex website.

In the event of any inconsistency between language versions of this GDPR Statement, the English version shall prevail.

