

# PRIVACY POLICY

*Last Updated: February 2026*

This Privacy Policy explains how SIZ EDU Limited, a Cayman Islands company with its registered office at Cannon Place, North Sound Rd., George Town, Grand Cayman KY1-9006, Cayman Islands, operating under the name SizeProp (“SizeProp”, “we”, “us”, or “our”), collects, uses, stores, discloses, and protects personal data when you access or use our website, applications, and related services (collectively, the “Services”).

This Privacy Policy forms part of, and should be read together with, our Terms and Conditions.

If you are a visually impaired user, a user who has another disability, or a user who seeks support in another language, you may access this Privacy Policy by emailing us at [privacy@sizeprop.com](mailto:privacy@sizeprop.com).

## 1. Scope

This Privacy Policy applies to personal data we collect in connection with the Services. It does not apply to third-party websites, platforms, or services that may be linked to or integrated with the Services. We are not responsible for the privacy practices of such third parties.

## 2. Personal Data We Collect

### 2.1 Data You Provide

We may collect personal data you voluntarily provide when you:

- Create or manage an account
- Purchase a Challenge
- Activate a Trial Account
- Request a payout
- Complete identity verification
- Contact customer support
- Communicate with us via email, Discord, or other platforms

This may include:

- Name and username
- Email address
- Date of birth
- Country of residence
- Account credentials
- Payment and billing details
- Cryptocurrency wallet addresses for payout processing

- Identity verification information for KYC and AML purposes
- Communications with support (including via Discord)

## **2.2 Publicly Shared Data (Discord and Leaderboards)**

Please be aware that any information you voluntarily disclose in public areas of our platform or community channels, such as our Discord server, community chats, or public Leaderboards, becomes public information. We do not control and are not responsible for how other users or third parties may use the data you choose to make public in these forums. You are advised to exercise caution when disclosing personal information in these public areas.

## **2.3 Data Collected Automatically**

When you access or use the Services, we may automatically collect technical and usage data, including:

- IP address
- Device fingerprints and identifiers
- Browser type and operating system
- Log files and timestamps
- Usage and interaction data

This information is used to operate the Services, maintain security, prevent fraud, and improve performance.

## **2.4 Simulated Trading Data**

When you participate in Challenges, use a Funded Account, or use a Trial Account, we collect data related to your simulated trading activity, including:

- Trade history and positions
- Performance metrics and statistics
- Trading patterns and behavior
- Account equity and drawdown data

This data is used to evaluate Challenge performance, enforce trading rules, detect prohibited conduct, and improve the Services.

When you use a Trial Account, data collection is limited to: email address, account credentials, IP address, device fingerprints, browser type, usage and interaction data, and simulated trading data (including trade history, positions, performance metrics, and trading patterns). Trial Accounts do not require identity verification, and no government-issued identification documents, facial images, or biometric data are collected in connection with Trial Account use. Data collected during a Trial Account may be retained and processed even if the user does not purchase a Challenge, in accordance with the retention and use provisions of this Privacy Policy.

## 2.5 Data from Third Parties

We may receive personal data from third-party service providers, including:

- Identity verification and compliance providers
- Payment processors
- Analytics and infrastructure providers

We do not purchase personal data from data brokers.

## 2.6 Identity Verification

We use Sumsub as our third-party identity verification provider. As part of KYC and AML compliance, Sumsub may collect and process:

- Government-issued identity documents
- Facial images and selfies
- Biometric data derived from facial recognition and liveness detection

Biometric data is collected and processed by Sumsub as part of identity verification. SizeProp's access to such data is limited to reviewing verification results and related materials within the Sumsub platform for compliance and fraud prevention purposes. SizeProp does not independently collect, analyze, or generate biometric identifiers or biometric templates.

SizeProp relies on Sumsub as its identity verification provider and does not store biometric data outside of Sumsub's secure environment, except where required or permitted by applicable law.

**Biometric Data Retention:** We retain biometric information only until the earlier of: (a) the initial purpose for collecting such information has been satisfied, or (b) one (1) year from your last interaction with us—at which point such biometric information will be permanently deleted.

## 3. How We Use Personal Data

We use personal data for the following purposes:

- Providing and operating the Services
- Account creation and administration
- Processing Challenge access and payouts
- Identity verification, fraud prevention, and compliance
- Responding to inquiries and providing support
- Enforcing our Terms and policies
- Maintaining platform security and integrity
- Improving and developing the Services
- Complying with legal and regulatory obligations

We do not use personal data to provide investment, financial, or trading advice.

## 4. Automated Decision Making

To maintain the integrity of the trading environment and enforce our Terms and Conditions, we use automated decision-making systems.

**Trading Rules:** Our systems automatically monitor simulated trading activity to detect breaches of trading rules, including but not limited to daily drawdown limits, maximum loss limits, and prohibited trading strategies.

**Consequences:** If a breach is detected, the system may automatically fail a Challenge or close a Funded Account without human intervention.

**Necessity:** These automated processes are necessary for the performance of the contract between you and SizeProp.

You may contact support to report suspected technical errors, though automated determinations regarding trading rule violations are final.

## 5. Legal Bases for Processing

Where required by applicable law, we process personal data on one or more of the following legal bases:

- Performance of a contract
- Compliance with legal obligations
- Legitimate interests such as security, fraud prevention, and service improvement
- Consent, where required

## 6. Disclosure of Personal Data

We may disclose personal data to:

- Service providers acting on our behalf
- Identity verification and compliance providers
- Payment processors
- Professional advisors
- Regulators, courts, or law enforcement where required by law
- Successors or acquirers in connection with a merger, acquisition, or similar transaction

We do not sell personal data.

## 7. International Data Transfers

SizeProp operates globally. Personal data may be transferred to and processed in jurisdictions outside your country of residence, including jurisdictions that may not provide the same level of data protection. Where required by applicable law, appropriate safeguards are implemented to protect personal data in connection with such transfers.

## 8. Data Retention

We retain personal data for a period of five (5) years from your last interaction with the Services, or longer where required or permitted to:

- Meet legal and regulatory requirements, including AML obligations
- Resolve disputes
- Enforce agreements
- Manage risk and compliance obligations

After the retention period, personal data is securely deleted or anonymized.

## 9. Security

We implement reasonable technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, or alteration. However, no system is completely secure, and we cannot guarantee absolute security.

## 10. Your Rights

Depending on your jurisdiction, you may have rights regarding your personal data, including access, correction, deletion, restriction, and portability.

### Cayman Islands Data Protection Rights

As a company incorporated in the Cayman Islands, SizeProp is subject to the Cayman Islands Data Protection Act (2021 Revision). Under this Act, you have the right to:

- Be informed about how your data is being used
- Access the personal data we hold about you
- Request correction of inaccurate data
- Request that we stop processing your data in certain circumstances
- Lodge a complaint with the Cayman Islands Ombudsman

## 11. Cookies and Similar Technologies

We use cookies and similar technologies to operate and improve the Services.

## **11.1 What Are Cookies**

Cookies are small text files placed on your device when you visit a website. They allow the website to recognize your device, remember preferences, and improve user experience.

## **11.2 How We Use Cookies**

SizeProp uses cookies to ensure proper website functionality, analyze usage, and enhance security.

- **Strictly Necessary Cookies:** essential for core functionality and security
- **Performance and Analytics Cookies:** used to analyze traffic and usage patterns
- **Functionality Cookies:** used to remember preferences and dashboard settings

## **11.3 Third-Party Analytics**

We use the following analytics providers:

**Google Analytics** — Used to track general website traffic and usage behavior. Data may be transmitted to and stored on servers in the United States.

**PostHog** — Used for product analytics within the dashboard, including feature usage and session behavior.

## **11.4 Managing Cookie Preferences**

You can manage cookies through browser settings or available opt-out tools. Blocking certain cookies may impact functionality.

## **12. Children's Data**

The Services are intended for individuals aged 18 or older. We do not knowingly collect personal data from children.

## **13. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. Changes become effective when posted with an updated "Last Updated" date. Continued use of the Services constitutes acceptance of the revised Privacy Policy.

## **14. Contact Information**

If you have questions about this Privacy Policy or wish to exercise your rights, contact:

SIZ EDU Limited  
Cannon Place  
North Sound Rd.  
George Town  
Grand Cayman KY1-9006  
Cayman Islands

Email: [privacy@sizeprop.com](mailto:privacy@sizeprop.com)

## GDPR AND EUROPEAN PRIVACY RIGHTS

*This section applies only to the extent applicable law requires.*

This section applies to individuals located in the European Economic Area, the United Kingdom, and Switzerland ("European Users").

### Lawful Basis for Processing

Where GDPR or equivalent laws apply, personal data is processed based on contractual necessity, legal obligations, legitimate interests, and consent where required.

### Your Rights Under GDPR

European Users have the right to access, rectification, erasure, restriction, objection, data portability, and withdrawal of consent, subject to applicable law.

### Supervisory Authorities

European Users have the right to lodge a complaint with a supervisory authority in their country of residence.

## US STATE PRIVACY RIGHTS

*This section applies to residents of U.S. states with applicable consumer privacy legislation, including California, Virginia, Colorado, Connecticut, and any other state where required by law.*

### Categories of Personal Data Collected

We may collect the following categories of personal data: identifiers (name, email address, IP address), account credentials, payment and billing details, cryptocurrency wallet addresses, government-issued identification documents, biometric data (collected by our third-party verification provider), internet or electronic network activity (device fingerprints, browser type, usage data), and simulated trading data.

### Use of Personal Data

We use personal data for the purposes described in Section 3 (How We Use Personal Data) of this Privacy Policy, including providing the Services, identity verification, fraud prevention, compliance, and service improvement.

### Sale and Sharing of Personal Data

SizeProp does not sell personal data. SizeProp does not share personal data for cross-context behavioral advertising purposes.

### Your Rights

Depending on your state of residence, you may have the following rights with respect to your personal data:

**Right to Know / Access:** You may request that we disclose the categories and specific pieces of personal data we have collected about you.

**Right to Delete:** You may request that we delete personal data we have collected from you, subject to certain exceptions.

**Right to Correct:** You may request that we correct inaccurate personal data we maintain about you.

**Right to Opt Out:** You may opt out of the sale or sharing of your personal data. As stated above, SizeProp does not sell or share personal data for advertising purposes.

**Right to Non-Discrimination:** We will not discriminate against you for exercising any of your privacy rights.

### **Exercising Your Rights**

To exercise any of these rights, contact us at [privacy@sizeprop.com](mailto:privacy@sizeprop.com). We may verify your identity before processing your request. We will respond to verifiable requests within the timeframes required by applicable law.

### **California Residents — Additional Disclosures**

Under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA/CPRA), California residents have the rights described above. SizeProp does not use or disclose sensitive personal information for purposes other than those permitted under CCPA/CPRA. You may designate an authorized agent to make a request on your behalf, subject to identity verification.