

CCTrader Privacy Policy

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CCTrader is operated by CCT Software B.V., registered in the Netherlands and located at:

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3447GW Woerden
The Netherlands
Website: <https://www.cctrader.app>
Email: support@cctrader.app

CCT Software B.V. is the data controller responsible for the processing of personal data as described in this Privacy Policy.

This Privacy Policy explains how we collect, use, store, and protect personal data when you use the CCTrader application and related services.

By using CCTrader, you agree to the processing of personal data as described in this policy.

1. User Profile Data

We collect:

- **User ID:** Randomly generated ID
- **Display Name:** User's chosen display name
- **Email Address:** Collected during account registration
- **Password:** Collected during registration (hashed password is stored)
- **Country:** User's country of residence
- **Telegram User Name:** Optionally provided by the user
- **Telegram Token:** Optionally provided by the user
- **Last Seen Timestamp:** Date and time of last application access
- **Last Activity Timestamp:** Date and time of last user activity
- **Total Activity Count:** Aggregate count of user activities
- **Account Creation Timestamp:** Date and time when account was created
- **Account Update Timestamp:** Date and time of last profile update

Purpose:

- **User ID:** Used to uniquely identify the user
- **Display Name:** Used to personalize the user interface
- **Email Address:** Required for account creation, authentication, password recovery, and email notifications

- **Password:** Required for secure account authentication
- **Country:** Used to understand user base origin and for possible future compliancy
- **Telegram User Name:** Used for sending notifications to the user via Telegram
- **Telegram Token:** Used for sending notifications to the user via Telegram
- **Last Seen/Activity Timestamps:** Used to track user engagement
- **Total Activity Count:** Used to track user engagement
- **Timestamps:** Used for audit trails

2. Exchange API Credentials

We collect:

- **Account Name:** User-defined name for each exchange account
- **Exchange Name:** Name of the cryptocurrency exchange
- **API Keys:** Exchange API keys for connecting to cryptocurrency exchanges, only stored locally on the user's machine (encrypted)
- **API Secrets:** Exchange API secret keys, only stored locally on the user's machine (encrypted)
- **API Passphrases:** Exchange API passphrases (when required by specific exchanges), only stored locally on the user's machine (encrypted)
- **Fee Discount:** User-configured fee discount percentage
- **User Keys:** User-specific encryption keys used to encrypt exchange API credentials (encrypted)

Purpose:

- **API Credentials (Keys, Secrets, Passphrases):** Required to connect to cryptocurrency exchanges
- **Account Name:** Used to help users identify and manage multiple exchange accounts
- **Exchange Name:** Required to connect to the correct exchange
- **Fee Discount:** Used to calculate accurate trading costs
- **User Keys:** Required to encrypt and decrypt exchange API credentials securely

3. Position and Portfolio Data

We collect:

Positions Data:

- **Position Records:** Trading positions including:
 - Exchange and symbol information
 - Relevant order IDs
 - Position type (long/short)
 - Assets acquired, invested, and recovered amounts
 - Realized profit/loss (PnL) and percentages

- Breakeven price
- Total fees paid
- Order status information

Portfolio History:

- **Portfolio Value Records:** Daily portfolio value snapshots
 - Date of snapshot
 - Portfolio value in USD
 - Associated exchange account

Purpose:

- **Positions Data:** Used to track and display user's trading positions, PnL, and trading analytics
- **Portfolio History:** Used to track and display portfolio value charts and historical performance analysis

4. Payment Data

We collect:

Payment Data:

- Customer ID
- Subscription ID
- Payment ID
- Subscription tier
- Discount code used
- Subscription duration
- Amount
- Currency
- Status
- Payment method
- Timestamps

Purpose:

- Required to track payment history and current status

5. Logging and Monitoring Data

We collect:

- **Server Logs:** Application logs including:
 - User IDs (randomly generated IDs only)
 - Socket IDs

- Error messages and stack traces
- Debug information
- Operation timestamps
- **IP Addresses:** Client IP addresses collected during:
 - Authentication attempts
 - API access requests
 - WebSocket connections
 - Security monitoring
- **User Agent Strings:** Browser/client application information
- **Connection Metadata:** WebSocket connection information and session data

Purpose:

- **Server Logs:** Required for debugging, troubleshooting, performance monitoring, and security auditing
- **IP Addresses:** Used for security monitoring, rate limiting, fraud prevention, and troubleshooting connection issues
- **User Agent Strings:** Used for security monitoring
- **Connection Metadata:** Used to manage WebSocket connections and detect unauthorized access

6. Data Security Measures

Encryption:

- Exchange API credentials are encrypted using user-specific keys before storage
- User keys are encrypted using Key Management Service (KMS)
- All data transmission uses HTTPS/TLS encryption

Access Control:

- Row Level Security (RLS) policies ensure users can only access their own data
- Authentication tokens are required for all data access

Storage:

- Data is stored in Supabase, an external database, using industry-standard security
- Data is stored in secure, SOC 2 Type 2 compliant, AES-256 encrypted databases
- Access to personal data is restricted to authorized personnel only

We encourage all users to use IP whitelisting for their exchange API credentials as an additional security measure and users must disable their exchange API keys for transferring and withdrawing assets at all times.

7. Third-Party Services

The following third-party services are used and may receive certain data:

- Supabase:
 - Hosts database and authentication services
 - Receives: user data, authentication data, application data
 - Purpose: Database hosting, authentication, and backend services
 - Location: Germany

- Digital Ocean:
 - Hosts backend services
 - Receives: authentication data, payment data, user-specific keys for exchange API credential encryption, alert data, Telegram username and token, webhook signals
 - Purpose: access control, payment handling, notifications and alerts, webhook signal processing
 - Location: Germany

- Mollie:
 - Payment provider
 - Receives: payment-related data, like credit card details
 - Purpose: handling of one-off and recurring payments to unlock paid features / subscription plans
 - Location: The Netherlands

- Better Stack:
 - Receives: Server logs, error messages, debug information (may include user IDs and IP addresses)
 - Purpose: Centralized logging and error monitoring
 - Location: Germany

- ipapi.co:
 - Receives: User's IP address (during registration only)
 - Purpose: Country detection for registration form

- Resend (via Supabase):
 - Receives: Email addresses
 - Purpose: Email delivery service for account verification and password recovery

8. Data Retention

- Account data: until account deletion
- Trading and portfolio data: until account deletion
- Payment data: up to 7 years (tax law compliance)
- Logs (including IP addresses): retained for 3 days
- Inactive accounts: deleted after 1 year of inactivity

9. User Rights

Users have the right to:

- Access their personal data
- Correct inaccurate data
- Delete their account and associated data
- Export their data

To exercise these rights, users can contact support.

10. Data Sharing

CCTrader does not sell, rent, or share personal data with third parties except:

- As necessary to provide the service (e.g., Supabase for data storage, Better Stack for logs, Resend for emails)
- When required by law or legal process
- To protect the rights, property, or safety of CCTrader, users, or others

11. Automated Decision-Making and Profiling

CCTrader does not engage in automated decision-making with legal or similarly significant effects and does not conduct profiling under Article 22 GDPR.

Changes to This Privacy Statement

This privacy statement may be updated periodically. Users will be notified of significant changes via email and/or inside the application.

Contact

For questions about this privacy statement or data practices, please contact:
support@cctrader.app